

College of MEDICAL LABORATORY
TECHNOLOGISTS of Ontario
2025 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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Glossary of terms

1. Background

Under section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2025.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

2. Organization information

Organization name	College of MEDICAL LABORATORY TECHNOLOGISTS of Ontario
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3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of MEDICAL LABORATORY TECHNOLOGISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Medical Laboratory Technologist
Academic requirement	a) successful completion of a Health Standards Organization (HSO) accredited medical laboratory technology education program OR, b) education equivalency according to the Canadian Society for Medical Laboratory Science (CSMLS) Prior Learning Assessment (PLA) or the Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR) PLA OR, c) possession of a baccalaureate degree from a Canadian university, whose major course content,

	<p>both lecture and practical, is relevant to medical laboratory technology, and which is approved by the Registration Committee OR, d) possession of education or a mixture of education and experience which is considered by the Registration Committee to be equivalent to that which is described in a), b), and c).</p>
<p>Experience requirement</p>	<p>a) have been actively engaged (used knowledge, skill and judgement as an MLT) in the practice of medical laboratory technology during the three years immediately preceding the date of the application OR, b) have successfully completed refresher courses approved by the CMLTO within the three (3) years preceding the date of the application. ***NOTE: active engagement requirements are detailed in the CMLTO Registration Committee Policy 13: Active Engagement which is available on our website (https://www.cmlto.com/wp-content/uploads/2024/11/RC-13.pdf)</p>
<p>Language requirement</p>	<p>a) successful completion of a medical laboratory science program accredited by the Health Standards Organization (HSO) (or its predecessor, the Canadian Medical Association conjoint accreditation services) OR b) Submission of proof acceptable to the Registrar (e.g., transcript that states language of instruction) that either: (a) both high school and medical laboratory science program (that was not accredited by the HSO or its</p>

	<p>predecessor) that included theoretical/academic coursework and a clinical placement, was completed in English or French; OR (b) that both high school and undergraduate degree that included theoretical/academic course work and a clinical placement/practicum/internship was completed in English or French; OR c) Submission of published academic paper(s) (e.g., thesis, research publications) authored by the Applicant as part of a Masters or Doctorate program successfully completed by the Applicant with an accompanying letter of verification acceptable to the Registrar from the principal investigator, a program professor, or supervisor stating English or French was the language of instruction and the language in which the academic paper was written; OR d) Current enrollment as a Voluntary Roster Affiliate; OR e) Achievement of the minimum scores outlined in one of the Registration Committee (RC) approved language fluency tests within the past two years. ***NOTE: language requirements are detailed in the CMLTO Registration Committee Policy 03: Language Fluency Requirements which is available on our website (https://www.cmlto.com/wp-content/uploads/2024/09/RC-03.pdf)</p>
<p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p>	<p>1. must be a Canadian citizen, a permanent resident of Canada, or have an authorization under the Immigration and Refugee Protection Act (Canada) 2. submit a cleared Criminal Record and</p>

	<p>Judicial Matters Check within the six months preceding application. (Registration Committee Policy 16: Background Check of Applicants) 3. successful completion of the Canadian Society for Medical Laboratory Science (CSMLS) certification exam (formerly CSLT) or Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR) field-of-practise exam(s) 4. If labour mobility applicant, submission of a letter of standing from a Canadian regulatory body in which the Applicant has current registration equivalent to the certificate of registration in which they are applying to the CMLTO. ***NOTE: For more information, please refer to the CMLTO Registration Committee Policy 11: Alternative Documents for Registration which is available on our website (https://www.cmlto.com/wp-content/uploads/2024/11/RC-11.pdf)</p>

4. Third party assessments

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

Organization name	Function
Canadian Society for Medical Laboratory Science	Competency-based assessment
Canadian Alliance of Medical Laboratory Professionals Regulators	Competency-based assessment

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

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

The Canadian Society for Medical Laboratory Science (CSMLS) previously administered Prior Learning Assessment (PLA) processes for Applicants and the national entry-to-practise examination under third-party contract arrangements. A transition began in 2025 and going forward, the Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR) will administer PLA processes for Applicants and field-of-practice examinations under third-party contract arrangements. Both completed CSMLS and CAMLPR PLAs and examinations are accepted as suitably meeting the needs of the applicable registration requirements. The CMLTO diligently ensured the implementation of fair and timely processes by conducting periodic evaluations of CSMLS services in adherence to the terms of the contract. This process will continue with CAMLPR. Comprehensive reports detailing the processes and outcome measures of PLAs and examinations are routinely reviewed by the CMLTO. NOTE: Function selection for the organization only allowed one selection, however, the CSMLS and CAMLPR each provides both PLAs and examination.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Collection of gender and race: With the launch of a new Registrant database platform, the CMLTO began collecting gender and race-based information from Applicants/Registrants, which helps the organization to identify any disparities in access and promote diversity initiatives. This was expanded in 2025 to be included in the 2026 renewal process allowing Registrants to update their information seamlessly.
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2	<p>Throughout 2025, planned Registrant database enhancements were made. CMLTO expanded their use of automatic confirmation emails to include post audit-submissions; providing clarity on next steps required of Registrants. Through the new platform, the CMLTO successfully completed the transition into a new year for the quality assurance program. This included clearing and storing historic Professional Practise Portfolio data for each Registrant. Progress has been made to ensure that customized approval letters are available for new Registrants that are accurate to their unique specialities. Areas of the portal for Registrants and the Application process were also updated to include the new third party collaborator, CAMLPR, where applicable.</p>
3	<p>As per Registration Committee Policy RC 08 – Refresher Courses, the list of refresher courses and list of Institutions (Universities, colleges, and other institutions) offering CMLTO approved courses relevant to the practice of medical laboratory science was reviewed and approved by the Registration Committee and posted on the CMLTO website. To support this proposal, Registration staff conducted a comprehensive review of Applicants and Registrants using refresher courses to demonstrate active engagement from the past three years. Registration staff reviewed each file to compile the list of refresher courses used either by an Applicant or Registrant to satisfy the active engagement requirement. Once the list of courses was compiled, staff conducted a trend analysis to determine the top overall courses and institutions based on the number of Applicants and/or Registrants submitting proof of completion.</p>
4	<p>Interprofessional Collaboration (IPC) Case Studies were updated to align them with CMLTO brand standards, reflect evolving MLT practices, and to ensure they are user-friendly. It was important that they were updated and relevant, as MLTs are encouraged to use them in their practice, as well as for professional development hours for compliance to the Quality Assurance Program. A French version was also created, improving accessibility. The updates were well-received by the Quality Assurance Committee, who found the revised case studies more engaging and relevant, and the Professional Members felt more motivated to incorporate them into their roles and practice. Overall, these updates significantly enhanced the usability and value of the case studies for both staff and Registrants.</p>

5	<p>Due to the growing importance of data protection in the evolving landscape of privacy legislation, as well as a significant increase in the reporting of privacy breaches by MLTs to the CMLTO Professional Conduct team, CMLTO developed an educational \"Privacy Campaign\" in 2025 and it was run 2026. This initiative was designed to reinforce the importance of all laboratory professionals to vigilantly safeguard sensitive information at all times and the consequences to Registrants (i.e. professional misconduct investigation) if they fail to maintain someone's privacy.</p>
6	<p>CMLTO has been historically involved with the accreditation process of educational facilities by Accreditation Canada. This was accomplished through Regulatory representation by Board Members who have been trained as assessors and participated as part of an assessment team. Due to the relatively small size of of the Medical Laboratory Science community, conflicts of interest were common. To mitigate this risk, and ensure that the CMLTO had options to ensure Regulatory representation at accreditation inspections could continue, a CMLTO staff member completed the required assessor training, and participated on one assessment in 2025. This helps to foster confidence in the both the accreditation process and the educational facilities; ultimately ensuring that future CMLTO Applicants are prepared to practise safely and effectively.</p>

B. Risks and Mitigations

Risk	Mitigation Measure
<p>Registration Data Migration was a risk in 2025 due to the previous transition to a new Registrant database the previous year.</p>	<p>In 2025, attention was given to resolving unique and high-risk data items including amending Registrants found to have multiple registration numbers. Data migration clean-up shall continue as the Registration team needs to determine how to provide Registrants access to historic information like proof of annual payments.</p>
<p>Key risks associated with the 2026 renewal cycle were identified. These included: • Potential site malfunctions</p>	<p>These risks were successfully mitigated. CMLTO staff followed robust processes to ensure critical functions were</p>

<p>on critical dates, such as December 31, 2025, and February 8, 2026 • System crashes caused by high user volume • Penalty fees not triggering accurately during the renewal process • Execution issues with IDMS processes on January 1, 2026 • Automated process for critical changes like suspensions and revocations could be faulty • iMIS reports that needed generation on December 31, 2025, for future use in 2026 reports could be incomplete</p>	<p>executed as planned through measures like system oversight at midnight when renewal opened. Additional support from the external database support team was leveraged when required. The Registrant database provider (iMIS) and CMLTO teams had established contingency plans, including emergency and off-hours support contacts, especially during the final week of December. On-call iMIS support staff were available to troubleshoot any issues promptly. Additional training for new Registration staff, including the iMIS bootcamp, was completed in October 2025. A schedule was implemented for after-hours coverage by CMLTO staff to support Registrants at the end of December 2025 to assist them with any Registrant database difficulties, such as resetting passwords.</p>
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6. Changes to registration practices

During the January 1 to December 31, 2025 reporting period, College of MEDICAL LABORATORY TECHNOLOGISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Timelines for registration,	No	

decisions and/or responses		
Changes to internal review or appeal process	No	
Assessment of qualifications, including competency-based assessments and examinations	Yes	In 2025, CMLTO began a transition from one provider to another for the qualifying examination registration requirement. Prior to 2025, proof of successful completion of the qualifying examination administered by CSMLS was required. Now, historic examination administered by CSMLS or applicable field of practise examination(s) administered by CAMLPR are acceptable. By implementing these new, field-specific exams for all future Applicants, CAMLPR is fulfilling the mandate to maintain consistent, high standards of practice that apply equally to both internationally and Canadian educated MLT's on behalf of the provincial MLT regulatory authorities. Similarly, if an Applicant did not have proof of MLT education, such as a diploma/degree from an HSO-accredited MLT program, a completed Prior Learning Assessment (PLA) through CSMLS was accepted. Now, historic PLA's from CSMLS or new PLA's from CAMLPR are accepted. During the transition, some Applicants required case-by-case support to transition from the previous provider to the new provider for PLA's. These were escalated to the Registrar when required. Information on the new provider CAMLPR can be found here: https://camlpr.org/
Registration requirements either through regulation, by-law or policy	No	

Documentation requirements for registration	No	
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B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Anti-racism and inclusion-based policies and practices	No	

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third parties	No	
Mutual recognition agreements	No	
Accreditation of educational programs	Yes	As previously shared, a CMLTO staff member completed the required assessor training for the assessment of an educational program and participated on one assessment in 2025. This helps to foster confidence in the both the accreditation process and the educational facilities; ultimately ensuring that future CMLTO Applicants are prepared to practise safely and effectively.

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Steps to address labour issues (minister/stakeholders consultations, check demand-supply gap, etc)	Yes	The Board of Directors was presented with a comprehensive risk-based HHR framework, which is now monitored at the quarterly Board meetings.
Other	No	

7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator’s membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? (Yes or No)
Members	YES
Applicants	YES

Additional description:

The CMLTO started collecting race-based data with migration to the new online platform in September 2024. All Applicants are required to fill it in as part of their application and Registrants can update this information voluntarily. By collecting the data, we hope to support improvements in inequalities in healthcare access,

quality, experience and outcomes. For 2026 renewal, further action was taken to collect race-based data from current Registrants.

B. Other identity-based or demographic data collected

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

Additional description:

CMLTO also collects the following identity-based data: Age/Date of birth, Title, Address, Electoral District, Sex, Citizenship, Preferred Language, Secondary and Tertiary spoken languages, Country of initial education/training, and Work History.

C. Languages of service provision

College of MEDICAL LABORATORY TECHNOLOGISTS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Medical Laboratory Technologist	7173

Class of License	Total Number of Members	Number of Internationally Educated Members
Practising	6607	1221
Non-Practising	566	82

Gender	Number of Members
Male	1503
Female	5473
X (includes trans, non-binary, and two-spirit people)	11
Other / not collected	186

Jurisdiction of Initial Training	Number of Members
Ontario	5469
Other provinces and territories	401
United States	32
Other International	1271

Country of Initial Training	Number of Members
Australia	3
Bahamas	1
Bangladesh	3
Barbados	1
Belgium	1
Bosnia and Herzegovina	1
Brazil	1
Cameroon	5
Canada	5870
Chile	1

China	29
Colombia	11
Congo	1
Costa Rica	1
Czechia	1
Ecuador	1
Egypt	18
Eritrea	5
Ethiopia	8
Finland	1
France	1
Ghana	2
Greece	1
Hong Kong	17
Guyana	11
India	350
Iran	73
Iraq	5
Israel	1
Jamaica	25
Jordan	12
Kenya	2
South Korea	5
Kuwait	5
Lebanon	15
Mauritius	5
Myanmar	1
Nepal	13
Netherlands	1
New Zealand	2
Nigeria	48
Norway	1
Pakistan	27
Palestine State	4
Peru	1
Philippines	454
Poland	5
Portugal	1

Qatar	3
Macedonia	2
Romania	1
Russia	4
Saudi Arabia	1
Serbia	1
South Africa	4
Sri Lanka	13
Sudan	28
Sweden	1
Switzerland	1
Taiwan	2
Thailand	1
Trinidad and Tobago	3
Uganda	2
Ukraine	1
United Arab Emirates	2
United Kingdom	16
United States of America	32
Venezuela	1
Yemen	1
Zimbabwe	2

Official language of preference	Number of Members
English	7085
French	88

Racial identity (optional)	Number of Members
Black	287
East / Southeast Asian	1481
Indigenous	39
Latin American	70
Middle Eastern	292

South Asian	646
White	3318
Not collected	1040

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Medical Laboratory Technologist	411

Gender	Number of Applicants
Male	85
Female	323
X (includes trans, non-binary, and two-spirit people)	2
Other / not collected	1

Jurisdiction of Initial Training	Number of Applicants
Ontario	304
Other provinces and territories	23
United States	2
Other International	82

Country of Initial Training	Number of Applicants
Cameroon	1
Canada	327
Egypt	1
Ethiopia	2
Ghana	1
Hong Kong	3
India	16
Iran	4
Iraq	2
Jamaica	1
Jordan	2
Kenya	1
Lebanon	1
Nepal	2
Nigeria	15
Norway	1
Philippines	20
Sudan	8
Trinidad and Tobago	1
United States of America	2

Official language of preference	Number of Applicants
English	408
French	3

Racial identity (optional)	Number of Applicants
Black	36
East / Southeast Asian	137
Indigenous	2

Latin American	2
Middle Eastern	28
South Asian	57
White	121
Not collected	28

G. Data Notes

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H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2025. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	298	4	4
Other provinces and territories	22	0	1
United States	0	0	2
Other International	76	1	1

Applications with decisions pending

The table below summarizes the inventory of applications in progress as of December 31, 2025. Again, some of these applications may have been received in the previous year.

Jurisdiction of initial training	Incomplete	Complete	Total
Ontario	1	6	7
Other provinces and territories	0	1	1
United States	0	0	0

Other International	4	10	14
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I. New Registrants

For the 2025 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Practising	386	71
Non-Practising	4	1

J. Data Notes

There is a discrepancy of 2 Canadian & 4 International applications between B.7. and B.9., because the count for B.7 captures the application decisions in status approved, whereas B.9 indicates numbers for those who completed the registration

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
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Ontario	4	4
Other International	1	1

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0
Other International	0	0

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals
1. Refusal for registration	3
2. Completion of pre-requisites for registration (refresher course selection)	2

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants
1. Don't meet exam & experience requirements	5

L. Data Notes

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Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.