



Business Plan 2015 - 2018



July 2015

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INTRODUCTION

The Ontario Ministry of Citizenship, Immigration and International Trade's (MCIT) Immigration Strategy – “A New Direction” – has three key objectives:

- to attract a skilled workforce and grow a stronger economy;
- to help newcomers and their families achieve success; and
- to leverage the global connections of our diverse communities to increase our prosperity.

The Ministry seeks to make Ontario a place where diversity is valued as a source of strength and where all people, including newcomers, seniors and women, are capable of contributing to a strong economy, caring society and enhanced quality of life. Part of this goal entails making Ontario a place where newcomers are able to find work in their fields of expertise.

To achieve this, barriers preventing newcomers from participating in the economic and social life of the province must be addressed. To this end, the Government proclaimed the *Fair Access to Regulated Professions Act, 2006* (“FARPA”) in March 2007 – the first legislation of its kind in the world. It called for the appointment of the Fairness Commissioner to ensure fair registration process in Ontario's regulated professions. The Act also established the Office of the Fairness Commissioner (OFC) to assist the Commissioner in carrying out her work in overseeing compliance with the Act.

FARPA also amended Schedule 2 to the *Regulated Health Professions Act* (“RHPA”) to extend fair registration obligations on health regulatory colleges.

On April 8, 2013, FARPA was amended to include compulsory trades regulated by the Ontario College of Trades under its ambit. It thus became the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* (“FARPACTA”).

FARPACTA requires Ontario regulatory bodies to have an efficient, fair and open registration process by means of:

- Transparent and objective assessment of qualifications;
- Timely response to applicants;
- Reasonable fees; and
- Fair and open licensing processes.

This business plan sets out how the OFC will successfully achieve its mandate.

MANDATE

The Fairness Commissioner is responsible for assessing the registration practices of Ontario's regulated professions and compulsory trades to ensure that they are transparent, objective, impartial and fair for anyone applying to practise his or her profession or trade in Ontario.

Section 13 (3) of FARPACTA sets out the functions of the Fairness Commissioner.

They are to:

- a) assess the registration practices of regulated professions based on their obligations under this Act and the regulations;
- b) specify audit standards, the scope of audits, times when registration practices shall be reviewed, times when fair registration practices reports and auditors' reports shall be filed, the form of all reports and certificates required under this Act and the regulations and the information that they must contain;
- c) consult with regulated professions on the cost, scope and timing of audits;
- d) monitor third parties relied on by regulated professions to assess the qualifications of individuals applying for registration by a regulated profession to help ensure that their assessments are based on the obligations of regulated professions under this Act and the regulations;
- e) provide information and advice to regulated professions and to professions that may be named as regulated professions to assist them in understanding how to comply with the requirements of this Act and the regulations;
- f) advise regulated professions, government agencies, community agencies, colleges and universities, third parties relied on by regulated professions to assess qualifications and others as the Minister may direct with respect to matters under this Act and the regulations;
- g) advise ministries with respect to matters under this Act and the regulations that affect a ministry or a regulated profession that falls under the jurisdiction of the ministry;
- h) establish eligibility requirements that a person must meet to be qualified to conduct audits;
- i) establish a roster of persons who in the opinion of the Fairness Commissioner have satisfied the eligibility requirements established under clause (h);
- j) advise the Minister on matters related to the administration of this Act;

- k) report to the Minister on registration practices related to internationally trained individuals and their registration by regulated professions and to other ministers in respect of those same issues as they relate to regulated professions that fall under the jurisdiction of their respective ministries; and
- l) perform such other functions as may be assigned by the Lieutenant Governor in Council. 2006, c. 31, s. 13 (3).

In addition, sections 19-21 of the Act require regulatory bodies to submit to the OFC yearly Fair Registration Practices Reports, undergo audits and conduct Entry-to-Practice Reviews to determine relevance and necessity of registration requirements.

The OFC has no mandate to advocate or intervene on behalf of individuals or to assess registration credentials.

ENVIRONMENTAL SCAN

The OFC operates in a highly dynamic environment at the intersection of government, regulatory and labour market spheres, each with their own stakeholders and issues. The following discussion notes some recent activity within the OFC's external environment that impacts its work.

Governmental Sphere

- The introduction of Express Entry in January 2015 for the federal skilled worker program will create further challenges for immigrant professionals by raising expectations and adding confusion about Canada's labour market needs for the regulated professions.
- In May 2015 Ontario passed the Ontario Immigration Act to help the province maximize the economic benefits of immigration. Focussing on the selection of skilled immigrants is one priority of the Act, and OFC anticipates that immigrants educated in regulated professions will be among those selected. Therefore OFC's work to reduce barriers in licensing will have continued relevance and potentially increased visibility.
- Ontario has created two new streams to draw from the Federal Express Entry selection system. They are Human Capital Priorities Stream and the French-Speaking Skilled Worker Stream.

In February 2013, the Ontario Human Rights Commission launched its *Policy on Removing the “Canadian Experience” Barrier*. The policy urges regulatory bodies to eliminate requirements for Canadian work experience unless there is compelling justification. This continues to be highly relevant to internationally trained applicants and the OFC continues to provide advice to regulatory bodies on how to align their registration requirements with the policy.

- For the past few years, regulatory bodies have been amending their registration regulations to comply with the *Ontario Labour Mobility Act* and changing scopes of practise and requirements. The OFC continues to review and comment on numerous regulation proposals and amendments to help regulatory bodies ensure that any changes do not run afoul of fair registration obligations. The OFC is also monitoring the impact of labour mobility on registration practices.

Regulatory Sphere

- The OFC’s scope encompasses 42 regulatory bodies that oversee regulated professions and compulsory trades in the province.
- Several new health regulatory bodies were proclaimed in recent years. The regulatory bodies for kinesiologists, trades and traditional Chinese medicine practitioners began licensing members in 2013-14. In 2015, homeopaths and psychotherapists began registering members. The Human Resources Professionals Association was established in 2013 and now falls under the OFC’s scope. The OFC continues to work with all new regulatory bodies to assist them in establishing fair registration practices and complying with their obligations under fair access legislation.
- Ontario’s three accounting regulatory bodies are in the midst of unifying. The OFC is closely monitoring this process and preparing for how it will assess the registration practices of the new regulatory body. The OFC has provided feedback on the merger, including comments on legislation and the by-laws of the new regulatory body.
- Self-regulation in Ontario has come under increasing scrutiny by governments and the public in recent years. For example, the Minister of Health and Long-Term Care appointed a supervisor for the College of Denturists of Ontario in March 2012, partly in response to concerns about fair registration. The OFC remains ever vigilant about the impact of fair registration practices on the self-regulation enterprise more broadly.
- The evolving roles of national competency frameworks, assessment agencies and other fairness commissions are having an impact on the regulatory landscape across Canada.

Stakeholders

The OFC's key stakeholders include provincial regulatory bodies, third party assessment agencies, provincial ministries responsible for the regulatory bodies, immigrant serving organizations, internationally trained applicants and the wider public. The table below presents an overview of key stakeholders and the OFC's relationship with them.

Profile of Stakeholders

Stakeholder	Regulatory bodies	Third Party Assessment Agencies	Provincial Government Ministries	Applicants	Other Organizations and Groups
Description	42 regulatory bodies that regulate professions and trades in Ontario.	Relied upon by regulatory bodies to assess applicant qualifications.	The OFC works at arm's length from the Ministry of Citizenship, Immigration and International Trade. Annual report includes a ministry by ministry update. The Ministry of Health and Long-Term Care receives reports from the OFC on regulatory bodies governed by the RHPA.	Thousands of internationally trained individuals who apply to Ontario's regulated professions and trades each year.	Immigrant serving organizations, post-secondary institutions, professional associations, unions and other relevant organizations.
Relationship	The OFC works with regulatory bodies to ensure compliance with fair access legislation.	Fair access legislation requires the OFC to hold regulatory bodies accountable for third parties used in the registration process.	Advisory relationship between OFC Executive Director and Ministry representatives.	The OFC is not mandated to formally receive complaints from applicants or to act directly on behalf of applicants. Nonetheless, applicants are at the heart of fair access, and are therefore important in informing the OFC's work.	The OFC promotes general outreach, awareness and communications on registration practices and the role of the OFC.

KEY STRATEGY

Vision and Guiding principles

The following vision is the foundation from which the OFC conducts its work. The OFC has also developed guiding principles to support its strategy and its work going forward.

Vision

The OFC's long-term vision is that Ontario will be known as a place where all professionals are qualified and all qualified individuals have access to their profession.

Guiding principles

1. Policy work is grounded in research

The OFC endeavours to inform its strategic approach through extensive research and broad consultations with a range of stakeholders.

2. Stakeholder viewpoints are considered in a balanced manner

The OFC obtains a clear picture of registration practices from studying the regulatory bodies themselves, the processes of qualifications assessment agencies relied upon by regulatory bodies and the views of applicants.

The OFC also receives numerous complaints and inquiries about registration practices directly from applicants. While the OFC cannot act on applicants' behalf in these matters, this connection with applicants is a valuable source of information.

3. The OFC works collaboratively with regulatory bodies

The OFC is respectful of the self-governing status of the regulated professions and trades, and always aims to work in the spirit of continued collaboration. The OFC actively engages regulatory bodies in its work.

4. The OFC works with regulatory bodies on an individual basis

OFC recognizes the differences in size, resources, legislation, subject matter and processes among regulatory bodies, as well as the highly dynamic context in which they operate. This approach allows the OFC to nimbly respond to the changing environment.

5. *Reporting requirements are reasonable*

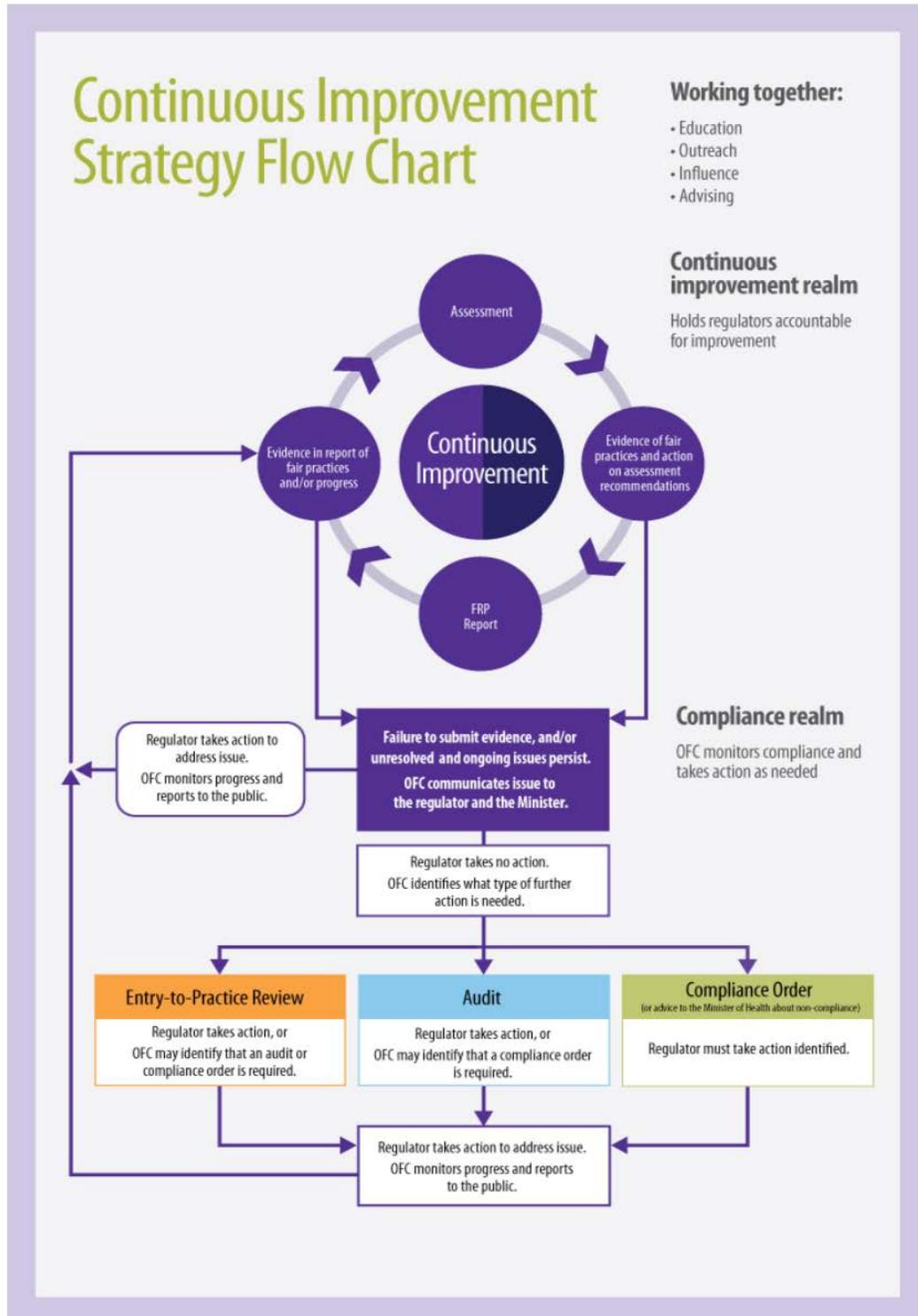
The OFC understands the reporting burden on regulatory bodies required by fair access legislation and it strives to limit reporting requirements to what is necessary for the OFC to fulfil its mandate under fair access legislation.

Continuous Improvement Strategy

The Continuous Improvement Strategy addresses how the OFC monitors the implementation of fair access legislation, facilitates the improvement of registration practices and fosters a culture of continuous improvement of registration practices in regulatory bodies (see page 8).

Strategy Flow Diagram

The following diagram shows the flow of activities in the OFC's strategy for continuous improvement:



ACTIVITIES

OFC's ongoing and future activities emanate from its continuous improvement strategy.

Ongoing Activities

Research and Policy Development

Refining OFC's Assessment Process

With the 2013-14 (cycle 2) assessment complete as of the fall of 2014, the OFC conducted a comprehensive review of the entire process, including assessment support material and communications, internal assessment manuals and related tools, as well as timing and other procedural issues. Areas in need of improvement have been identified and strategies are being developed to improve the assessment process for the next cycle.

Updating Policy Documents

The OFC has reviewed its guidelines for audits and Entry-to-Practice Reviews. OFC staff made amendments to the related documents which were finalized and released in 2015. The Registration Assessment Guides and Fair Registration Practices Report Guidelines are being clarified and refined. Both will be finalized and released in 2015.

Advising and Influencing

Ongoing Consultative Committee Meetings

The OFC's Consultative Committee (primarily consisting of stakeholders from the regulatory sphere) meets twice per year for information sharing and collaboration at a strategic level. Regular meetings are expected to continue.

Growing the Exemplary Practices Database

The Exemplary Practices Database was launched in June 2013. This is a unique tool developed specifically by the OFC to illustrate registration practices that best exemplify fairness principles. It is updated as needed, whenever the OFC identifies exemplary practices. As a result of the 2013-14 (cycle 2) assessment cycle, the OFC added

44 new exemplary practices to the database. New practices continue to be added as OFC monitors the implementation of its recommendations to regulators.

Monitoring and Assessing

Staff remain in contact with regulatory bodies in order to monitor the implementation of recommendations for improvement that were issued during cycle 2 assessments.

Looking Ahead

Monitoring and Assessing

Moving to Triennial Assessment Cycle

The office has moved to a three-year assessment cycle to allow regulatory bodies more time to implement recommendations. Accordingly, in 2016-2017 OFC expects to conduct its third cycle of assessments. This round will involve full assessments of all regulatory bodies that fall under the OFC's mandate. The subsequent cycle of assessments is slated for 2019-2020.

Since 2007, the OFC has collected information and data about registration from regulatory bodies in Ontario. Policy and Program Advisers analyze these reports to identify issues and trends to inform the work of the office. With the impending revisions to the Fair Registration Practices Report Guidelines, the OFC intends to expand the type of data it collects, which will give it further insight into registration practices in ways not currently possible.

Research and Policy Development

Modernizing Fair Registration Practices Guidelines and Online Reporting Tool

The Commissioner approved a new approach to the Fair Registration Practices Report Guidelines in September 2014. The new approach is being articulated in updated guidelines for regulators. The OFC will also develop communications material and implementation support tools to help regulators adapt to the changes.

In 2015, the OFC will work with an external IT vendor to modernize the online reporting website for the Fair Registration Practices Reports. This is expected to go live for the 2015 reporting cycle (reports to be submitted by March 2016).

Ongoing Research

Research will continue to play an important role in the OFC's work. A number of emerging issues pertinent to registration will be examined by the OFC in order to inform its advice to regulators and policy positions.

OFC contributed two articles to a special edition of Canadian Public Policy. The publication is expected to be released in mid-2015.

Education and Outreach

Education

The OFC is developing a series of online learning modules to serve as an educational resource to regulatory bodies and other stakeholders. The modules will assist users in understanding the fair access law and how it applies to registration processes.

OFC will host a learning day for regulators in late 2015, to focus on issues identified for improvement in cycle 2 assessments.

Advising and Influencing

Engaging Stakeholders

The OFC expects to continue providing input and feedback to Human Resources and Development Canada on the Foreign Qualifications Recognition program and to the Canadian Information Centre for International Credentials on the pan-Canadian quality standards in international credential evaluation.

A number of organizations have expressed interest in OFC's research on immigrant licensing and underemployment. The office will continue to share its results and identify opportunities to bring its work to a wider audience.

OFC continues to receive requests from regulatory bodies to present to registration committees and councils. Presentations may be specific to the profession's work with the OFC, or of a general nature to inform new members of the regulator's fair access duties.

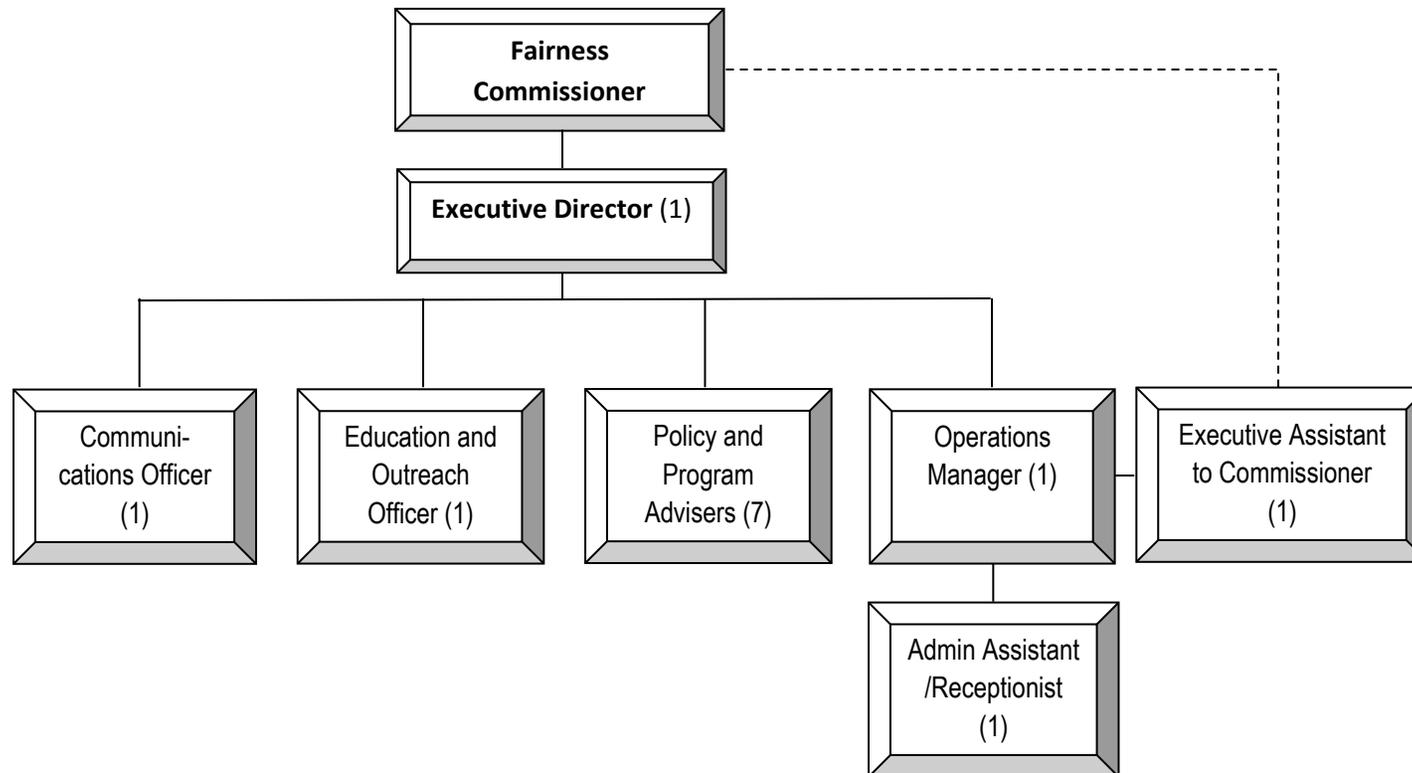
Compliance and Enforcement

Support for Continuous Improvement

As part of the 2016-2017 assessment cycle, OFC expects to issue recommendations for improvement and to monitor the development of action plans.

Every effort is made to ensure that regulators understand their fair access obligations and to provide them with all necessary information and support. In instances when a regulatory body fails to uphold its legal obligations with respect to fair access, the OFC may exercise its compliance and/or enforcement options in order to ensure the regulated professions adhere to the relevant legislation.

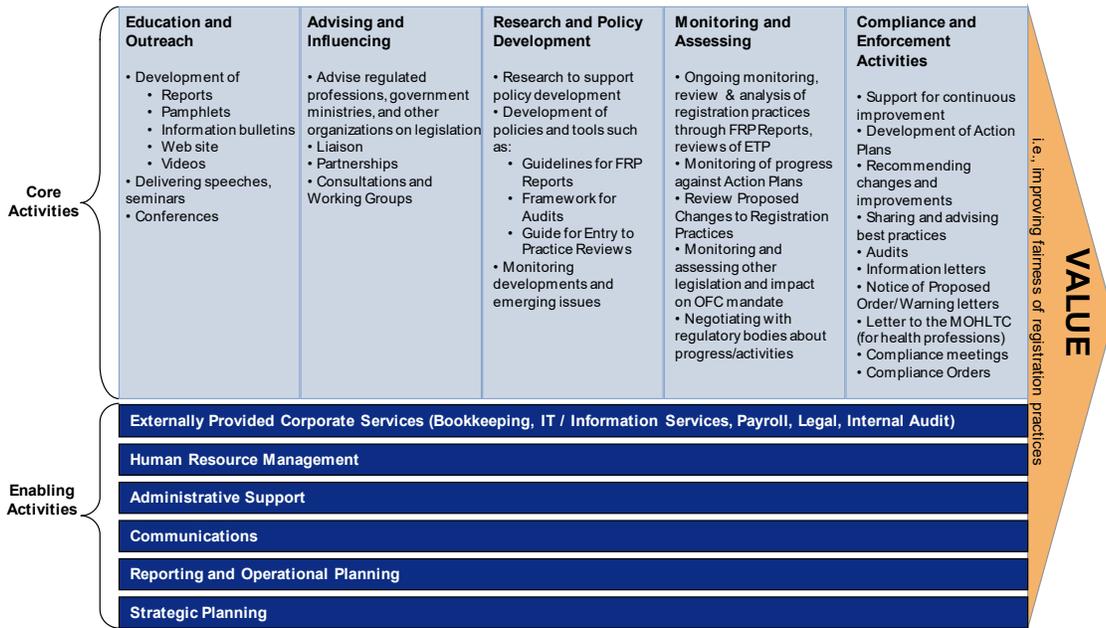
ORGANIZATIONAL STRUCTURE



Note: all numbers in organizational structure represent full-time equivalents (FTEs)

Value Chain

The following value chain represents the OFC’s five core activities with associated functions listed within each one. The OFC’s six enabling activities are also listed.



PERFORMANCE MEASUREMENT FRAMEWORK

Objectives

Since the mid-1980s Ontario has grappled with the recognition of foreign qualifications and barriers faced by internationally trained immigrants in integrating into the economy. Governments have struggled to come up with solutions to address discriminatory practices in licensing. OFC was established to address this problem. The OFC reduces barriers to licensure in Ontario’s regulated professions by meeting the following objectives:

1. Ensuring that regulatory bodies improve their registration practices. The OFC does this by assessing their registration practices, issuing recommendations for improvement, and by monitoring implementation on an ongoing basis
2. Ensuring that regulatory bodies are accountable to the OFC by meeting their fair access reporting requirements

*Indicates an assessment year, assessments take place every three years. Timeframes for regulators to implement recommendations vary.

Objective 1				
Ensuring that regulatory bodies improve their registration practices. The OFC does this by assessing their registration practices, issuing recommendations for improvement, and by monitoring implementation on an ongoing basis (<i>Value Chain: Monitoring and Assessing</i>)				
Activities	Performance Measures	Target 2015-2016 (Yr. 3 of cycle 2)	Target 2016-2017* (Yr. 1 of cycle 3)	Target 2017-2018 (Yr. 2 of cycle 3)
Assessment of registration practices every three years	Percentage of recommendations for improvement, from the most recent assessment cycle, that were implemented	• 85%	• n/a	• 75% ¹

¹ Assessments may be “full” or “targeted”. Cycle 2 was a targeted assessment, therefore only selected registration practices were examined. Cycle 3, beginning in 2016 will be a full assessment and all registration practices will be evaluated. Given that more registration practices will be examined in 2016-2017, it is possible that a greater number of recommendations will be issued than in the previous cycle. Therefore, regulators may have to implement a greater number of recommendations in order to achieve full implementation and OFC would expect only a portion of those to be implemented by 2017-2018.

Objective 2

Ensuring that regulatory bodies are accountable to the OFC by meeting their fair access reporting requirements (*Value Chain: Monitoring and Assessing*)

Activities	Performance Measures	Target 2015-2016 (Yr. 3 of cycle 2)	Target 2016-2017* (Yr. 1 of cycle 3)	Target 2017-2018 (Yr. 2 of cycle 3)
<ul style="list-style-type: none"> • Monitor submission of required reports (FRP, ETP, self-assessments, other) • Review reports for acceptability 	<ul style="list-style-type: none"> • Percentage of regulators that met their reporting requirements 	<ul style="list-style-type: none"> • 65% (new FRP reports and self-assessment reports anticipated) 	<ul style="list-style-type: none"> • 80% (FRP reports and self-assessment reports anticipated) 	<ul style="list-style-type: none"> • 80% (FRP reports anticipated. Possible that "Other" reports may be requested)

RISK MANAGEMENT FRAMEWORK

Value Chain Activities	Objectives	Risks	Mitigation
Monitoring and Assessing	<p>Objective 1:</p> <p>Ensuring that regulatory bodies improve their registration practices.</p>	<p>Reputational risk OFC at risk of being perceived as unable to address barriers due to regulatory bodies being unable or unwilling to improve registration practices.</p>	<ul style="list-style-type: none"> • The OFC continues to ensure that there is an open and ongoing dialogue with regulatory bodies, in order to continue to be aware of and to understand their challenges. OFC also ensures that stakeholders are aware of their requirements under FARPACKTA.
Monitoring and Assessing	<p>Objective 2:</p> <p>Ensuring that regulatory bodies are accountable to the OFC by meeting their fair access reporting requirements</p>	<p>Information Technology risk Technical challenges with the FRP modernization project may delay deployment of the new reporting tool.</p> <p>Financial Risk Technical challenges may impact the overall cost of the project.</p>	<ul style="list-style-type: none"> • Data related challenges have been addressed in the procurement to inform potential vendors. • Should technical challenges delay deployment of the new FRP system, the existing tool can continue to be used. • Project monitoring processes and budget contingencies have been put in place to reduce risk of cost over-runs.

PLANNED EXPENDITURES

Planned Expenditures 2015-2018

	2014-2015 Actuals	OFC Planned Expenditures		
		2015-2016	2016-2017	2017-2018
Transfer Payment	1,860,428 ²	\$1,795,088	\$1,795,088	\$1,795,088
Salaries & Wages	1,105,145	\$ 1,115,330	\$1,115,330	\$1,115,330
Benefits	207,141	\$196,850	\$196,850	\$196,850
Services ³	274,216	\$265,908	\$265,908	\$265,908
Office Administration	150,517	\$137,000	\$137,000	\$137,000
Transportation and Communication	39,878	\$30,000	\$30,000	\$30,000
Capital Asset Expenditures & Amortization	9,250	\$50,000	\$50,000	\$50,000
TOTAL	1,820,855⁴	\$1,795,088	\$1,795,088	\$1,795,088

² \$1,795,088 Grant/Subsidy from the Province + \$65,340 Special project Grant/Subsidy.

³ Services include professional services for communications such as website, editing, translation as well as application development and maintenance for FRP reporting.

⁴ Includes \$34,708 for depreciation and leasehold improvements.

COMMUNICATIONS STRATEGY

Communications activities and expenditures are aligned with the OFC's core mandate of ensuring fair access to the regulated professions and trades in Ontario. The majority of the communications budget is allocated to maintaining and enhancing the OFC's main website.

Strategic Role of Communications and Stakeholder Outreach

Communications and stakeholder outreach are vital in fulfilling the mandate and achieving OFC's vision by:

- Helping regulatory bodies and third party assessment agencies understand and implement transparent, objective, impartial and fair registration practices;
- Ensuring that all government stakeholders understand the OFC's mandate, approach and vision; and
- Managing expectations among qualified applicants and agencies serving immigrants.

Objectives

The objectives of this communications and stakeholder outreach plan are to:

- 1) Increase stakeholder understanding of the OFC, its mandate, its strategy to drive improvement of registration practices, its assessment and oversight role, and the progress it has made in achieving its vision;
- 2) Build on existing relationships with regulatory bodies and associated third parties so that they fulfill their responsibilities to ensure transparent, objective, impartial and fair registration practices; and
- 3) Ensure that all target audiences and stakeholders understand that the OFC is involved in systemic change that is necessarily longer term.

Positioning Statements

- The OFC is an independent arm's-length agency of government, and works collaboratively with regulatory bodies to ensure that registration practices are transparent, objective, impartial and fair.
- The OFC is a leader in working for positive, systemic change to address an issue vital to the future of our economy and to many thousands of qualified individuals who have come to Canada to practice their profession or trade and pursue their dreams.
- The OFC is doing ground-breaking work to help regulatory bodies embrace change and proactively ensure that no barriers exist to registration for qualified individuals regardless of where they are trained.
- The OFC works to ensure qualified individuals will know Ontario as a place where their training and qualifications are the sole criteria for practising their profession. They will have the opportunity to work to their full potential, achieve their personal goals and to make an immediate, meaningful and lasting contribution to building our province and our country.

Key Stakeholders

- a) Regulatory sector
- b) Government
- c) Immigrant Serving Groups
- d) Media
- e) Other (e.g. selected post-secondary institutions offering foundation education and bridging programs)

Key Activities

OFC website

The website is the most effective way to reach a large number of target audiences with limited resources. Enhancements such as info-graphics may be considered to highlight key information.

OFC Newsletter

The e-newsletter is included as part of the overall correspondence mix. Email newsletters, traditional correspondence and other tools can be used to keep all stakeholders informed.

Education and Outreach

The focus will be on key stakeholder groups and will include presentations to councils of regulatory bodies, immigrant serving organizations, government ministries etc.

Presentations and Speaking Engagements

OFC will continue to participate in conferences to share the results of its work and to situate fair access work within broader issues such as the global competition for talent, the economic need for highly educated immigrant professionals, professional regulation and immigrant integration.

Communications and Other Materials

The OFC issued its annual report in a booklet format for ease of distribution and marketing. It has developed handouts for specific purposes/audiences, written guides for regulatory bodies and developed a variety of other information materials. These are being reviewed and updated on a regular basis and made consistent with the website.

APPENDIX A

List of Regulatory bodies and associated ministries:

The OFC interacts with the following ministries that have responsibility for the regulatory bodies under their purview:⁵

- **Agriculture, Food and Rural Affairs**
 - College of Veterinarians of Ontario
- **Attorney General**
 - Ontario Association of Architects
 - Institute of Chartered Accountants of Ontario
 - Professional Engineers Ontario
 - Certified General Accountants of Ontario
 - Human Resource Professional Association of Ontario
 - Law Society of Upper Canada
 - Certified Management Accountants of Ontario
- **Community and Social Services**
 - Ontario College of Social Workers and Social Service Workers
- **Education**
 - College of Early Childhood Educators
 - Ontario College of Teachers
- **Health and Long-Term Care**
 - College of Audiologists and Speech-Language Pathologists of Ontario

⁵ The following regulatory bodies have no ministerial affiliation: Ontario Association of Certified Engineering Technicians and Technologists, and the Human Resources Professional Association of Ontario.

- College of Chiropractors of Ontario
- College of Chiropractors of Ontario
- College of Dental Hygienists of Ontario
- Royal College of Dental Surgeons of Ontario
- College of Dental Technologists of Ontario
- College of Denturists of Ontario
- College of Dietitians of Ontario
- College of Homeopaths of Ontario
- College of Kinesiologists of Ontario
- College of Massage Therapists of Ontario
- College of Medical Laboratory Technologists of Ontario
- College of Medical Radiation Technologists of Ontario
- College of Midwives of Ontario
- College of Naturopaths of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Opticians of Ontario
- College of Optometrists of Ontario
- Ontario College of Pharmacists
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists of Ontario
- College of Respiratory Therapists of Ontario
- College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario

- **Natural Resources and Forestry**
 - Ontario Professional Foresters Association
 - Association of Ontario Land Surveyors
- **Northern Development and Mines**
 - Association of Professional Geoscientists of Ontario
- **Training, Colleges and Universities**
 - Ontario College of Trades