Study of Registration Practices of the

COLLEGE OF RESPIRATORY THERAPISTS OF ONTARIO, 2007
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The Office of the Fairness Commissioner is an arm’s-length agency of the Ontario government, established under the Fair Access to Regulated Professions Act, 2006. Its mandate is to ensure that certain regulated professions have registration practices that are transparent, objective, impartial and fair.
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1. INTRODUCTION

The Office of the Fairness Commissioner (OFC) undertook a study of registration practices of Ontario’s regulated professions during the fall and winter of 2007–2008. The purpose of the study was to understand each regulated profession’s 2007 registration practices and to establish baseline data and information to enable the OFC to measure progress as it fulfills its mandate under the Fair Access to Regulated Professions Act, 2006.

This report reflects the registration practices of the College of Respiratory Therapists of Ontario as of December 31, 2007. Information in this report was gathered from:

- face-to-face meetings with registration staff of the regulatory body
- additional documentation provided by the regulatory body
- relevant websites
- career maps for the profession posted on the Ministry of Citizenship and Immigration’s website (where applicable).

The College of Respiratory Therapists of Ontario also provided registration information and statistics for 2005, 2006 and 2007 through a standard spreadsheet designed by the OFC.

An analysis and summary of the findings for all of the regulated professions is contained in the OFC’s Ontario’s Regulated Professions: Report on the 2007 Study of Registration Practices.

2. BACKGROUND OF THE REGULATORY BODY

A. Legislation


B. Protected Titles

The CRTO regulates respiratory therapists. To practise respiratory therapy in Ontario, applicants must hold a Certificate of Registration (licence) as a respiratory therapist with the CRTO. In addition, only members of the CRTO may use the title “respiratory therapist,” or a variation or abbreviation or
an equivalent in another language, or hold themselves out as qualified to practise in Ontario as respiratory therapists or in a specialty of respiratory therapy.

C. Definition of the Profession

Registered respiratory therapists (RRTs) specialize in caring for people with breathing difficulties. They help to monitor, evaluate and treat individuals with respiratory and cardio-respiratory disorders. RRTs work in a wide variety of settings including hospitals, home care, education, private diagnostic laboratories, research and sales.

The majority of CRTO members provide direct patient care; their responsibilities may include caring for adults, children and newborns in any or all of the following situations:

- critical care including emergency, intensive care and trauma services
- anaesthesia support
- patient assessment and treatments
- support for patients or clients in their residence
- diagnostic testing services including:
  - analysis of blood for oxygen and carbon dioxide levels (arterial blood gas analysis) and various other blood values
  - analysis of pulmonary function (volumes in/out of lungs; amount of oxygen and carbon dioxide moving between the lungs and the blood; ability to move volumes in/out of lungs fast)
  - analysis of the body’s response to stress (exercise)
  - cardiac electrical activity (electrocardiogram; ECG)
  - sleep studies (polysomnography)
- transporting patients to the hospital and between hospitals
- cardiopulmonary resuscitation (CPR)
- controlling and supplying medical gases
- patient/family/caregiver education
- health promotion
Within any of the above areas, some of the procedures that a respiratory therapist might perform include:

- insertion of artificial airways (intubation — putting a tube through the mouth or nose into the trachea)
- suctioning — applying suction to keep the upper airway, trachea or lungs clear of mucus
- mechanical ventilation — “life support system” monitoring, assessing and caring for patients of all ages who need assistance breathing
- medication delivery — using a mask and nebulizer or a “puffer”
- ensuring a warm environment for a newborn who is unable to maintain body temperature

RRTs might be involved in caring for patients who have the following diseases or conditions:

- asthma
- chronic bronchitis
- emphysema
- pneumonia
- respiratory distress
- croup
- chest trauma — broken ribs, etc.
- pulmonary fibrosis
- heart failure
- underdeveloped lungs in premature infants
- drowning victims
- car accident victims
- spinal cord injuries
- strokes
- head injuries
D. Labour Market

Historically there has been a lack of full-time funded positions for RRTs. As a result, there is a small number of respiratory therapists in Ontario in relation to the population. The CRTO anticipates a growing need for RRTs due to Ontario’s rapidly aging population, which is larger than that of other provinces.

Approximately 70 per cent of RRTs work in hospitals in acute settings.

Perhaps because respiratory therapy is a fairly recent profession and is not regulated in many jurisdictions, and because it is primarily practised in North America, relatively few internationally trained individuals apply to enter the profession in Ontario.

E. New Developments Within the Profession

A pilot project funded by the Ministry of Health and Long-Term Care will reduce surgical wait times with the creation of anaesthesia care teams and two new roles for anaesthesia-related health care workers: anaesthesia assistants (AAs) and nurse practitioners-anaesthesia. The majority of trained AAs are respiratory therapists.

The Council of the CRTO is considering an amendment to the registration regulation that could increase the number of internationally trained individuals applying to enter the profession in Ontario. Currently, applicants have to have “successfully completed a program offered outside Canada for training respiratory therapists that, at the time of completion, was considered by the Council to be equivalent to a program offered in Canada that was approved or accredited by the Council or by a body approved by the Council.” If the amendment is approved, the language would read “substantially equivalent to.” This would allow applicants who have been trained in a program that is slightly different from those offered in Ontario, but that appears to offer basically the same education, to become registered as respiratory therapists.

The Health System Improvements Act, 2007 (Bill 171) received royal assent in June 2007. Once proclaimed in force, the act will require the CRTO to rewrite all of its policies, procedures and bylaws.

F. Staffing

The CRTO staff consists of eight full-time employees. One full-time employee is dedicated to the registration process, and is supported on professional practice issues by the Manager, Policy and Investigations, and by the Registrar.
3. REGISTRATION PRACTICES

A. Registration Requirements and Application Process

i. Basic Requirements for Registration

To become licensed by the College of Respiratory Therapists of Ontario, all applicants (whether Canadian trained or internationally trained) must:

- Have graduated from a program in respiratory therapy that has been approved/accredited or considered equivalent by the college or have demonstrated through a prior learning assessment (PLA) that he or she has knowledge, skills and judgment equivalent to those of a person who has successfully completed an approved program.

- Have successfully completed the examinations approved by the CRTO Council. At this time the college accepts the Canadian Board of Respiratory Care (CBRC) National Certification Examination for entry to practice and the CRTO Core Competencies Evaluation (CCE), although the latter is no longer offered.

Prior to completing the approved examination, an applicant may be granted a Graduate Certificate of Registration. This is a temporary class of registration and is automatically revoked after 18 months. It allows the graduate to perform the functions of a respiratory therapist under the supervision of a fully qualified RRT or another regulated health professional.

- Be proficient in English or French.

- Be a Canadian citizen or a permanent resident of Canada or be authorized under the Immigration and Refugee Protection Act to engage in the practice of respiratory therapy.

- Not have been found guilty of a criminal offence or an offence under the Controlled Drugs and Substances Act or the Food and Drugs Act.

- Not currently be the subject of a professional misconduct, incompetence, incapacity or other similar proceeding in another profession or in another jurisdiction in respiratory therapy.

An applicant for a Graduate Certificate of Registration must have met the education requirement within the two years immediately preceding the application for registration unless the applicant was practising respiratory therapy in a jurisdiction outside Ontario within that two-year period. An applicant for a General Certificate of Registration must have met the education requirement within the two years immediately preceding the application for registration unless the applicant was practising respiratory therapy within that two-year period. These are exemptible requirements.
The educational requirement and the Canadian Board of Respiratory Care (CBRC) National Certification Examination for entry to practice are non-exemptible.

**ii. Steps in the Registration Process**

To begin the registration process, applicants are required to submit an Application for Registration form and send it to the CRTO along with the supporting documentation and application fee.

A Graduate Certificate of Registration is issued to an individual who has met all academic requirements (see section 3.d) but has not yet successfully completed the examination or evaluation approved by the college. This is a temporary class of registration and is automatically revoked after 18 months.

The following standard terms conditions and limitations are typically imposed on a Graduate Certificate of Registration:

- The member must advise current and future employer(s) of the terms, conditions and limitations on the certificate of registration.
- The member may perform a controlled act, authorized to respiratory therapy, only under the general supervision of a regulated health professional who is authorized to perform the controlled act and available within 10 minutes.
- The member may not perform added or advanced prescribed procedures below the dermis.
- The member may not delegate any controlled acts to other individuals.
- The member must successfully complete examinations approved by Council within 18 months from the date he/she is issued a Graduate Certificate of Registration or the certificate of registration will be automatically revoked at midnight on that date.

**B. Documentation Required of Internationally Trained Individuals**

**i. Standard Documentation**

In addition to the application materials required of all applicants, the CRTO also requires all applicants to submit the following:

**Registration Verification Form**

Applicants who are registered as respiratory therapists in another jurisdiction, or are registered in any other health profession are required to complete the registration verification form. They complete section A of the form, and ask their regulatory/licensing body to complete section B and to forward it to the CRTO.
Educational Records

Applicants must ensure that official transcripts from their educational program have been sent directly to the college from the Registrar’s/transcript office.

An applicant who has not completed an approved respiratory therapy program and who is requesting that the Registration Committee review the program for equivalency status must provide the documents listed under program equivalency review in section 3.d, below. Only original documents or notarized copies will be accepted. Applicants should contact their educational institution regarding these documents before immigrating to Canada.

Applicants are responsible for having the documents that are not in English or French translated and notarized at their own expense.

Canadian Citizenship, Permanent Residency Status

Documentation verifying Canadian citizenship, permanent residency status or employment authorization to work as a respiratory therapist must accompany the Application for Registration. A photocopy of the document is sufficient.

Language Proficiency

See section 3.g below.

Employment Information

An applicant who has been practising as a respiratory therapist or in a related field must provide a detailed employment history, including names and addresses of employers, dates of employment or volunteering, and a list of job titles and duties performed.

If any application documents are under a different name than the one the applicant is currently using, proof of the change in name (e.g., copy of marriage certificate) must be provided.

ii. Options for Applicants with Unavailable/Destroyed Documents

The prior learning assessment (PLA) process is an option available to individuals whose documents are not accessible. For information on PLA, see section 3.d.

C. Credential Assessment (Third Party and/or Internal)

The CRTO’s regulations require that an applicant has graduated from a CRTO-approved program; they do not specify that the credential offered be a diploma or a degree. The current options for applicants who have not graduated from a CRTO-approved program are the prior learning assessment (PLA) process and the Program Equivalency Review. The Program Equivalency Review,
conducted by the Registration Committee, looks at the content of the applicant’s program, unlike the PLA, which assesses competencies.

Credential assessments from assessment agencies like World Education Services (WES) or the Comparative Education Services of the University of Toronto (CES) are not used by the CRTO to determine competencies.

D. Academic/Program Requirements
To become registered as a respiratory therapist with the CRTO, an applicant must:

- have graduated from a program in respiratory therapy that has been approved or considered equivalent by the college

  or

- have demonstrated through a prior learning assessment (PLA) that he or she has knowledge, skills and judgment equivalent to those of a person who has successfully completed an approved program.

Options for Graduates of Unapproved Programs
Applicants who have not graduated from an approved program are not immediately eligible for registration with the college. However, there are two options available to these applicants: the prior learning assessment (PLA) process and the Program Equivalency Review.

Prior learning assessment: The PLA process is a mechanism for applicants who have not graduated from an approved program to demonstrate whether or not they possess the knowledge, skills and abilities required to enter the profession in Ontario. The PLA is based on a list of entry-to-practice competencies that are considered essential for the practice of respiratory therapy in Ontario.

The PLA was not designed to be a “bridging” program (although bridging programs are currently under development), but rather to help the college measure applicants’ qualifications against the CRTO entry-to-practice competencies. At present, there are two educational institutions approved by the CRTO to conduct PLAs: the Michener Institute for Applied Health Sciences in Toronto and Algonquin College in Ottawa.

Applicants who choose to undertake the PLA are required to submit to the CRTO the complete application for registration. If the application and supporting documentation are approved, the applicant is referred for PLA at one of the approved educational institutions. Applicants have a total of 18 months to complete the PLA, which consists of three stages:
Stage 1 – Interview and Feedback: A PLA program coordinator at one of the approved educational institutions conducts an interview to get a better idea of the applicant’s qualifications and educational background. The purpose of this stage is to make sure that the applicant understands what it means to be a respiratory therapist in Ontario and that he/she is sufficiently prepared to start the process. If it is determined that an applicant has any weaknesses or deficiencies in a particular area he/she is provided with suggestions as to how these can be addressed.

Stage 2 – Didactic Assessment: At this stage, the applicant is required to sit a written test based on the CRTO entry-to-practice competencies. The applicant has a maximum of two opportunities to pass the Didactic Assessment. The applicant must pass the Didactic Assessment in order to move to the next stage.

Stage 3 – Clinical Assessment: In this final stage of the PLA, the applicant is asked to perform as a respiratory therapist in a controlled environment where he/she is observed and assessed on his/her practical abilities. There is only one opportunity to pass the Clinical Assessment.

Applicants able to demonstrate through a prior learning assessment that they have the knowledge, skills and judgment equivalent to those of a person who has successfully completed an approved respiratory therapy program are eligible to register with the college in the Graduate class, and are deemed eligible to write the approved entry-to-practice examination.

Applicants unsuccessful in the PLA process are not able to register with the college. Unsuccessful candidates may choose to apply to an approved respiratory therapy program.

Program equivalency review: If the applicant’s education program was specific to respiratory therapy, the applicant may choose to request that the college review the program in order to determine whether it is equivalent to a CRTO-approved respiratory therapy program. If applicants choose this option, the application is referred to the Registration Committee for review of any documents the applicant submits.

In order for an applicant to be considered as having successfully completed a respiratory therapy program that, at the time of completion, was considered by the Council to be equivalent to an approved program, the applicant must provide sufficient evidence that the entry-to-practice competencies were effectively taught and evaluated by the program. This includes, for example, ensuring that

- The classroom and clinical components enable students to attain all the required competencies.
Students have exposure to a variety of practice locations.

Training is provided by expert clinical and didactic instructors; thorough and effective evaluation of students takes place in all didactic and clinical settings using appropriate techniques.

A program quality management/evaluation system is in place.

Where possible, original documentation should be sent directly from the institution to the CRTO. Where this is not possible, the CRTO will accept notarized copies of the documentation. Documents required for assessment of equivalency may include the following:

- transcripts/mark sheets/grade lists
- a description of the program
- date program began
- list of affiliations with other organizations (e.g., clinical sites, hospitals and other educational institutions)
- program admission criteria
- program curriculum (didactic and clinical components)
- detailed course outlines that include how students are evaluated
- information on the clinical rotations of the program, including location and number of hours/weeks
- faculty lists and credentials
- accreditation status, if any.

If the Registration Committee decides that the applicant’s respiratory therapy program is equivalent, it will make a recommendation to Council for approved program status. This process may take up to six months.

Once the program is deemed to be equivalent, graduates will be eligible to register with the college in the Graduate class, and will be deemed eligible to write the approved entry-to-practice examination.

If the Registration Committee is not able to determine that the educational program is equivalent to an approved Canadian respiratory program, the applicant will not be eligible for registration. However, the applicant may be referred to undergo the prior learning assessment process or can choose to enroll in an approved respiratory therapy programs.
The following is a list of all of the competencies considered essential for entering the practice of respiratory therapy in Ontario. This list represents the 11 domains of minimum knowledge, skills and abilities/judgment that an applicant must possess and have demonstrated before being granted entry into the practice of respiratory therapy in Ontario. In addition, the National Alliance of Respiratory Therapy Regulatory Bodies has developed a National Competency Profile (NCP) in 2003, which it is currently reviewing.

I. Anatomy and Physiology
   A. Cardiorespiratory system
   B. Central nervous system
   C. Renal system
   D. Other body systems

II. Pathophysiology

III. Pharmacology

IV. Wellness and Safety

V. Basic Sciences Related to Respiratory Therapy

VI. Medical Gases

VII. Infection Control

VIII. Diagnostic and Therapeutic Modalities and/or Equipment
   A. Adjunctive equipment
   B. Airway management
   C. Anaesthesia
   D. Assessment — blood
   E. Assessment — cardiac
   F. Assessment — hemodynamic
   G. Assessment — physical examination
   H. Assessment — pulmonary
   I. Bronchial hygiene and chest care
   J. Humidity and aerosol therapy
   K. Imaging
   L. Medical gas therapy
   M. Patient/client education
   N. Suction and drainage
   O. Transport of patients
   P. Ventilatory support
IX. Professional issues

A. Professional Self-regulation
B. Regulated Health Professions Act
C. Respiratory Therapy Act
D. Health Care Consent Act

E. Related legislation
F. Health care system
G. Research
H. Continuous learning

X. Communication Skills

XI. Analytical Skills

E. Work Experience Requirements

Although the CRTO does not require applicants to fulfill a work-experience requirement in order to become registered, all CRTO-approved RT education programs include a lengthy clinical internship (range of eight to 12 months) in the final academic year.

A Graduate Certificate of Registration entitles a graduate member to perform the functions of a respiratory therapist under the supervision of a fully qualified RT or another regulated health professional.

Internationally trained respiratory therapists who have had practical experience in their own country do not receive any partial or whole exemptions.

F. Examinations

An applicant for a General Certificate of Registration must have successfully completed the examinations approved by the CRTO Council. Currently the CRTO accepts the Canadian Board of Respiratory Care (CBRC) National Certification Examination and successful completion of the CRTO Core Competencies Evaluation, although the latter is no longer offered. The CBRC is a national and standardized exam.

The examination has two components. The first is multiple choice. The second is a case-study simulation. The CBRC exam is offered in January and in July. Applicants are given three attempts at passing the examination and they can usually accomplish this before their Graduate Certificate expires. After a third failure, they cannot try the exam again until they have submitted a study plan to and received approval from the Registration Committee. Before trying the exam for a fourth time, applicants must submit a declaration indicating that they have completed the study plan.
Passing the examination is a non-exemptible requirement.

With the exception of assistance with the study plan, neither the CRTO nor the CBRC provides any assistance or preparatory materials to applicants taking the CBRC National Certification Examination.

A new examination blueprint is being developed by the National Alliance of Respiratory Therapy Regulatory Bodies for implementation in 2009.

G. Language Requirements

Applicants whose first language is neither English nor French and whose respiratory therapy training was not in English or French must submit documentation to demonstrate fluency in English or French.

CRTO will accept one of the tests and scores listed below as proof of language proficiency.

**English Language Tests and Scores**

- CanTEST — Reading: 4, Writing: 4, Listening: 4, Speaking: 4.5
- International English Language Testing System (IELTS) — verbal band score: 7
- Michener English Language Assessment (MELA) — Reading: 8, Writing: 8, Listening: 9, Speaking: 9
- Michigan English Language Assessment Battery (MELAB) — Total score at least 85, plus an oral rating of at least 3
- Test of English as Foreign Language (TOEFL), Internet-based — Total: 92, Reading: 21, Writing: 21, Listening: 21, Speaking: 24
- TOEFL, paper-based — 580, plus Test of Spoken English (TSE) 50
- TOEFL, computer-based — 237, plus Test of Spoken English (TSE) 50

**French Language Test and Scores**

- Test pour étudiants et stagiaires au Canada (TEStCan): minimum score of 5 in each category

A copy of the score report must be submitted with the initial application for registration. The applicant is responsible for the cost of the language proficiency test.
The Michener Institute offers the Michener English Language Assessment (MELA) and the Preparation for Practice in Canadian Healthcare lecture and seminar series to assist internationally educated health professionals in all disciplines.

H. Fees

<table>
<thead>
<tr>
<th>College of Respiratory Therapists of Ontario</th>
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<tbody>
<tr>
<td>Application fee (non-refundable)</td>
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<tr>
<td>Registration fee(^2)</td>
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<table>
<thead>
<tr>
<th>Prior Learning Assessment (PLA)</th>
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<tbody>
<tr>
<td>Stage 1: Interview and Feedback</td>
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<tr>
<td>Stage 2: Didactic Assessment</td>
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<tr>
<td>Stage 3: Clinical Assessment</td>
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PLA fees are payable to the educational institution conducting the assessment. Applicants are not required to submit all fees at once.

<table>
<thead>
<tr>
<th>Canadian Board of Respiratory Care (CBRC)</th>
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<tr>
<td>National Certification Examination</td>
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The examination fee is payable to the Canadian Board of Respiratory Care (CBRC), not to CRTO.

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\(^1\) Fees include GST.

\(^2\) The college registration year runs from March 1 to the end of February. For applicants who have never been registered with the college, registration fees are prorated on a quarterly basis, as follows: $500 as of March 1; $375 as of June 1; $250 as of September 1; and $125 as of December 1. Former members returning to the College are required to pay the full registration fee of $500 regardless of the month in which the application is made.
I. Third Parties

<table>
<thead>
<tr>
<th>Name of Third Party</th>
<th>Relationship to Regulatory Body</th>
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<tbody>
<tr>
<td>Canadian Board for Respiratory Care</td>
<td>Administers the entry-to-practice exam.</td>
</tr>
<tr>
<td>Michener Institute for Applied Health Sciences</td>
<td>Coordinates the Prior Learning Assessment (PLA) process and offers a bridging program for CRTO PLA candidates beginning in the fall 2008. Also offers the Michener English Language Assessment (MELA) and Preparation for Practice in Canadian Healthcare to assist internationally educated health professionals in a variety of disciplines.</td>
</tr>
<tr>
<td>Algonquin College</td>
<td>Coordinates the Prior Learning Assessment (PLA) process and offers the Algonquin Connecting Expertise of the Internationally Trained (ACEIT) bridging program.</td>
</tr>
<tr>
<td>National Alliance of Respiratory Therapy Regulatory Bodies</td>
<td>Investigates issues related to the entry of internationally trained practitioners into the profession through a Foreign Credential Recognition (FCR) program funded by Human Resources and Social Development Canada. Currently updating the various examination processes to reflect the National Competency Profile and addressing situations related to examination and assessment that may be different for Canadian versus internationally trained respiratory therapists; also currently reviewing the National Competency Profile.</td>
</tr>
</tbody>
</table>

J. Typical Length of the Process

Applications must be submitted to the CRTO within two years of graduation.

If the Registration Committee is of the view that a respiratory therapy program is equivalent, it will make a recommendation to Council for approved program status. This process may take up to six months.

Applicants are granted an 18-month temporary Graduate Certificate of Registration when they complete the education component. After passing the CBRC examination they receive the General Certificate of Registration.

The Prior Learning Assessment process, and in particular the clinical assessment portion, tends to cause the longest delays in the registration process owing to a scarcity of suitable clinical placements.
The Michener Institute and Algonquin College coordinate the PLA process and scheduling these clinical placements presents a challenge.

K. Accredited Programs
The Canadian Society of Respiratory Therapists (CSRT) is the national professional association for respiratory therapists. Its Council on Accreditation for Respiratory Therapy Education (CoARTE) is the accrediting body that assesses entry-level educational programs to determine whether they meet the CSRT’s national accreditation requirements.

The CRTO accepts graduates from schools accredited by CoARTE in the following provinces:

**Ontario**
- Algonquin College of Applied Arts and Technology, Ottawa
- Canadore College of Applied Arts and Technology, North Bay
- La Cité collégiale — Collège d’arts appliqués et de technologie, Ottawa
- Conestoga College Institute of Technology and Advanced Learning, Kitchener
- Fanshawe College of Applied Arts and Technology, London
- Michener Institute for Applied Health Sciences, Toronto

**Alberta**
- Northern Alberta Institute of Technology, Edmonton
- Southern Alberta Institute of Technology, Calgary

**British Columbia**
- Thompson Rivers University (formerly University College of the Cariboo), Kamloops

**Manitoba**
- School of Medical Rehabilitation: Respiratory Therapy, Winnipeg

**New Brunswick**
- Collège communautaire du Nouveau-Brunswick, Campbellton
- New Brunswick Community College, Saint John

**Newfoundland**
- College of the North Atlantic (formerly Cabot College of Applied Arts, Technology and Continuing Education), St. John’s
Nova Scotia
The QEII/Dalhousie School of Health Sciences (formerly Victoria General Hospital School of Respiratory Therapy), Halifax

Quebec
Cégep de Chicoutimi
Cégep de Sainte-Foy
Collège de Rosemont, Montreal
Collège de Sherbrooke
Vanier College, St-Laurent

The Committee on Accreditation for Respiratory Care (COARC) is the American equivalent of the CSRT’s CoARTE. At its June 13, 2003, meeting, the CRTO Council passed a motion granting equivalency to any American program accredited (by COARC) at the 200 (therapist) level. To verify whether an American respiratory therapy program is equivalent to an approved Canadian program, applicants should contact the CRTO. Concern regarding some American programs has led to a review of this policy, the outcome of which has yet to be determined.

Applicants who have not graduated from an approved program should refer to section 3.d for more information about the Prior Learning Assessment (PLA) process and the Program Equivalency Review.

L. Internal Review/Appeal Process
The Registration Committee handles applications forwarded by the Registrar for administrative reconsideration owing to possible internal errors. Mechanisms exist for reviewing and appealing final registration decisions. The relationship of the review/appeal bodies to the decision-making body in the registration process is an arm’s-length one.

Under the Regulated Health Professions Act (RHPA), Health Professions Procedural Code (HPPC), the Registrar/college staff review applications and refer to the Registration Committee only those where there is doubt that the applicant meets a registration requirement. A panel of the Registration Committee reviews an application referred to the committee by the Registrar. If the panel makes an adverse decision and the applicant submits new information, it will be considered by the same panel.

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3 The Trois-Rivières campus of Collège Ellis started offering a course respiratory therapy in August 2007, but it has yet to be accredited.
An adverse decision by the panel may be reviewed by the Health Professions Appeal and Review Board (HPARB), an independent review board established under the RHPA. The candidate is notified in writing of the right to seek a review and provided with the mailing address of the board.

Under the RHPA-HPPC, an applicant is entitled to a copy of the registration file except when it is deemed that the safety of any person might be jeopardized by this action.

The CRTO bylaw states that the Registration Committee shall consist of at least five voting members with at least one Council member who is a member of the college; at least one Council member appointed to the Council by the Lieutenant Governor-in-Council; and at least two non-Council committee members. There are eight members, three of whom are Council members who are members of the college, three of whom are Council members appointed to the Council by the Lieutenant Governor-in-Council and two of whom are non-Council committee members.

Limited information about the HPARB process is currently available on the CRTO’s website.

4. BRIDGING PROGRAMS

The Michener Institute created the Access and Options Program in 2002 specifically to provide services to internationally educated health professionals (IEHPs) who were qualified outside Canada, who are permanent residents of Canada (or who have been approved for immigration to Canada) and who are eligible to take the relevant certification examinations. However, because the numbers were so low, classes for respiratory therapy applicants were discontinued, and instead applicants have one-on-one sessions with the PLA coordinator.

The Michener Institute for Applied Health Sciences has recently developed a “bridging program” for CRTO PLA candidates to begin in the fall 2008. The bridging program, which will be optional for those going through the PLA process, includes a four-week didactic program, a 15-week simulated clinical semester prior to the didactic assessment, and a clinical component with both a learning plan and assessment.

Algonquin College offers the Algonquin Connecting Expertise of the Internationally Trained (ACEIT) program under which internationally trained health care professionals, including respiratory therapists (with or without Canadian registration), are eligible to apply to ACEIT options such as PREP. The PREP training option assists individuals in preparing to write the CBRC exam and consists of remedial study courses taken in an individualized program of studies on a part-time basis. This option is only for candidates referred to Algonquin College by the CRTO as being eligible to challenge the exams. In addition, the Integration into Respiratory Therapy option assesses individuals
for their knowledge and clinical skills via the PLA (prior learning assessment) mechanism. Candidates with significant knowledge and skills associated with respiratory therapy may be eligible to integrate into the full-time Respiratory Therapy program to take the courses and clinical experience required to meet requirements for graduation as a respiratory therapist.

5. MUTUAL RECOGNITION AGREEMENTS

The CRTO is a signatory to a domestic mutual recognition agreement (MRA) between the provincial regulatory organizations for respiratory therapy in Ontario, Manitoba, Quebec and Alberta. The respiratory therapy MRA establishes the conditions under which a respiratory therapist with an unrestricted practice certificate in one jurisdiction will be recognized and allowed to practise in those other named jurisdictions in Canada.

6. APPLICANTS’ INTERACTIONS WITH REGULATORY BODY

A. Nature and Frequency of Communication

The CRTO communicates with applicants throughout the registration process and will alert an applicant if documents are missing. After an applicant is approved for the PLA process, the CRTO does not communicate with the applicant until the PLA is completed. Post PLA, the nature and frequency of communication depends on how often an individual contacts the CRTO while moving forward through the registration process.

B. Backlogs

The CRTO has no backlogs in its registration process.

C. Complaints Regarding the Registration Process

Any complaints regarding the CRTO’s registration process are referred to its Registration Committee for a decision. Appeals of Registration Committee decisions are submitted to the Health Professions Appeal and Review Board.


7. **CHANGES SINCE THE 2005 SURVEY**

The Ministry of Citizenship and Immigration conducted a survey in 2005 to collect information about occupational regulatory bodies in Ontario. Since 2005, the CRTO signed a memorandum of understanding (MOU) with Algonquin College with respect to its PLA process. The CRTO also now has a language proficiency policy and a fact sheet for internationally trained individuals.

The CRTO is discussing the creation of bridging programs with education partners, as outlined in section 4 above, and it is updating its clinical checklist for the PLA process. Currently, the CRTO’s Registrar can refer an individual to the PLA process directly.

The National Alliance of Respiratory Therapy Regulatory Bodies is a new third party that is evolving to take on a larger role with respect to credential assessments for the CRTO. It received funding for a project to investigate issues related to the entry of foreign-trained practitioners into the profession of respiratory therapy in Canada and to revise entry-to-practice examinations for competency assessments of foreign-trained and Canadian educated individuals. The data gathered by the National Alliance will be used by the CRTO in part to inform some of the policy decisions around the certification examination.

The CRTO is also developing a new examination blueprint that outlines the weight and importance of each of the competencies. It will be used to develop a nationally consistent competency examination process based on the National Competency Profile and will include a validated bank of examination items that can be used to create exams The examination blueprint is scheduled for implementation in 2009.

8. **REGISTRATION INFORMATION AND STATISTICS**

Definitions used in these tables:

**Alternative class of licence:** a class of licence that enables its holder to practise with limitations; additional registration requirements must be met in order to be fully licensed. Alternative classes of licence granted by the College of Respiratory Therapists of Ontario are specified under the tables below.

**Applicant:** an individual who has applied to start the process for entry to the profession.

**Applicant actively pursuing licensing:** an applicant who had some contact with the College of Respiratory Therapists of Ontario within the year specified.
**Inactive applicant:** an applicant who had no contact with the College of Respiratory Therapists of Ontario within the year specified.

**Member:** an individual who is currently able to use the protected title or professional designation of “respiratory therapist.”

### Languages in which application information materials are available

<table>
<thead>
<tr>
<th>Language</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>French</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Other(s)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Countries where internationally educated applicants were initially trained in respiratory therapy

<table>
<thead>
<tr>
<th>Applications Received</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Largest number</td>
<td>United States</td>
<td>Philippines</td>
<td>United States</td>
</tr>
<tr>
<td>Second-largest number</td>
<td>China</td>
<td>United States/India</td>
<td>Philippines</td>
</tr>
<tr>
<td>Third-largest number</td>
<td>Philippines</td>
<td>China/Belarus</td>
<td>India/Bangladesh</td>
</tr>
<tr>
<td>Fourth-largest number</td>
<td>India/Colombia</td>
<td>Russia/Bangladesh</td>
<td>Armenia/Iran</td>
</tr>
<tr>
<td>Fifth-largest number</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Staff employed by the College of Respiratory Therapists of Ontario**

<table>
<thead>
<tr>
<th>Number of Staff</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Involved in registration process</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Involved in appeals process</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
</tbody>
</table>

**Jurisdiction where members were initially trained in respiratory therapy (before they were granted use of the protected title or professional designation in Ontario)**

<table>
<thead>
<tr>
<th>Members</th>
<th>Ontario</th>
<th>Other Canadian Provinces</th>
<th>USA</th>
<th>Other International</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total members</td>
<td>2,247</td>
<td>186</td>
<td>69</td>
<td>7</td>
<td>2,509</td>
</tr>
<tr>
<td>Non-practising members</td>
<td>125</td>
<td>11</td>
<td>4</td>
<td>1</td>
<td>141</td>
</tr>
</tbody>
</table>
### Applicants processed by the College of Respiratory Therapists of Ontario in 2005

<table>
<thead>
<tr>
<th>Jurisdiction where members were initially trained in respiratory therapy (before they were granted use of the protected title or professional designation in Ontario)</th>
<th>In 2005 (Jan. 1 to Dec. 31)</th>
<th>Ontario</th>
<th>Other Canadian Provinces</th>
<th>USA</th>
<th>Other International</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>New applications received</td>
<td>133</td>
<td>17</td>
<td>7</td>
<td>12</td>
<td>169</td>
<td></td>
</tr>
<tr>
<td>Applicants actively pursuing licensing</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Inactive applicants</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Applicants who met all requirements and were authorized to become members but did not become members</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Applicants who became members</td>
<td>89</td>
<td>15</td>
<td>4</td>
<td>1</td>
<td>109</td>
<td></td>
</tr>
<tr>
<td>Applicants who were authorized to receive an alternative class of licence(^1) but were not issued a licence</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Applicants who were issued an alternative class of licence(^1)</td>
<td>23</td>
<td>0</td>
<td>2</td>
<td>0</td>
<td>25</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\) The CRTO currently issues one alternative class of licence; this Graduate Certificate of Registration is issued to persons who have met all the academic requirements but have not yet successfully completed the examination or evaluation required by CRTO. This is a temporary class of registration that is automatically revoked after 18 months.
### Applicants processed by the College of Respiratory Therapists of Ontario in 2006

<table>
<thead>
<tr>
<th>Jurisdiction where members were initially trained in respiratory therapy (before they were granted use of the protected title or professional designation in Ontario)</th>
<th>In 2006 (Jan. 1 to Dec. 31)</th>
<th>Ontario</th>
<th>Other Canadian Provinces</th>
<th>USA</th>
<th>Other International</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>New applications received</td>
<td>114</td>
<td>22</td>
<td>5</td>
<td>17</td>
<td>158</td>
<td></td>
</tr>
<tr>
<td>Applicants actively pursuing licensing</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Inactive applicants</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Applicants who met all requirements and were authorized to become members but did not become members</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Applicants who became members</td>
<td>102</td>
<td>18</td>
<td>1</td>
<td>2</td>
<td>123</td>
<td></td>
</tr>
<tr>
<td>Applicants who were authorized to receive an alternative class of licence but were not issued a licence</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Applicants who were issued an alternative class of licence</td>
<td>14</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>17</td>
<td></td>
</tr>
</tbody>
</table>

¹ The CRTO currently issues one alternative class of licence; this Graduate Certificate of Registration is issued to persons who have met all the academic requirements but have not yet successfully completed the examination or evaluation required by CRTO. This is a temporary class of registration that is automatically revoked after 18 months.
## Applicants processed by the College of Respiratory Therapists of Ontario in 2007

<table>
<thead>
<tr>
<th>Jurisdiction where members were initially trained in respiratory therapy (before they were granted use of the protected title or professional designation in Ontario)</th>
<th>In 2007 (Jan. 1 to Dec. 31)</th>
<th>Ontario</th>
<th>Other Canadian Provinces</th>
<th>USA</th>
<th>Other International</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>New applications received</td>
<td>142</td>
<td>9</td>
<td>8</td>
<td>9</td>
<td>168</td>
<td></td>
</tr>
<tr>
<td>Applicants actively pursuing licensing</td>
<td>139</td>
<td>8</td>
<td>5</td>
<td>9</td>
<td>161</td>
<td></td>
</tr>
<tr>
<td>Inactive applicants</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>0</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>Applicants who met all requirements and were authorized to become members but did not become members</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Applicants who became members</td>
<td>122</td>
<td>8</td>
<td>1</td>
<td>1</td>
<td>132</td>
<td></td>
</tr>
<tr>
<td>Applicants who were authorized to receive an alternative class of licence(^1) but were not issued a licence</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Applicants who were issued an alternative class of licence(^1)</td>
<td>23</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td>30</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\)The CRTO currently issues one alternative class of licence; this Graduate Certificate of Registration is issued to persons who have met all the academic requirements but have not yet successfully completed the examination or evaluation required by CRTO. This is a temporary class of registration that is automatically revoked after 18 months.
9. SOURCES


Representatives of the College of Respiratory Therapists of Ontario met with staff of the Office of the Fairness Commissioner on December 3, 2007, to provide further information for this study.