



Annual Report of the Office of the Fairness Commissioner 2023–2024

A Breakthrough Year for Fair Registration Practices



FAIRNESS COMMISSIONER

COMMISSAIRE À L'ÉQUITÉ

**OFFICE OF THE FAIRNESS COMMISSIONER
BUREAU DU COMMISSAIRE À L'ÉQUITÉ**

An agency of the Government of Ontario
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Commissioner's Message

I was initially appointed as Fairness Commissioner in January 2020 and have now occupied this position for just over four years. In my first [annual report](#), I shared some information on my personal background and motivations for seeking this role, which you are welcome to review in our [2020-2021 Annual Report](#).

This annual report covers the period from April 1, 2023, to March 31, 2024. During this time frame, the Office of the Fairness Commissioner (OFC) embarked upon, or continued, numerous important initiatives designed to achieve better outcomes for applicants to the regulated professions, regulated health colleges and skilled trades. We have also worked hard to solidify our reputation as a modern and responsive regulator.

In many ways, this was a year of breakthroughs. A growing list of regulators have taken significant steps to modernize and, in some cases, transform their assessment and registration processes. We will provide some inspirational examples later in this report.

Second, the provincial government has continued to methodically revamp the *Fair Access to Regulated Professions and Compulsory Trades Act 2006*, to adjust provisions that were no longer effective, set more measurable compliance obligations and to generally address barriers to registration. These steps have already produced positive results, which we will discuss later in this document.

Third, there is a growing recognition that fair registration practices and labour market objectives are closely linked. The convergence of these goals has sparked proactive initiatives to increase the throughput of internationally trained applicants to the professions and trades and to challenge adherence to outdated and risk adverse ways of thinking. In this report, we will highlight five such breakthrough initiatives to provide a flavour of the work underway in the sector.

Within this dynamic backdrop, the last 12 months have been a busy time for our office. We were involved in three separate tranches of legislative reform. We participated in initial consultations with staff from the Ministry of Labour, Immigration, Training and Skills Development (MLITSD or the ministry), provided information, advice and guidance materials to regulators on how to meet new legal obligations, and actively monitored compliance with these requirements. We elaborate on our collective activities later in the report.

In addition, we also launched the second iteration of our successful risk-informed compliance framework (RICF). Following consultation with regulators, we updated our policy and proceeded to refresh the risk ratings for the 41 regulators over which we have oversight. We provide further information on this process, as well as the new ratings for each regulator, later in the annual report.

We also expended considerable energy on launching our new data portal which will enable regulators to provide their annual Fair Registration Practices (FRP) reports to us in a streamlined, electronic format. We developed this technology-enabled solution in consultation with our regulator community and have begun to work on a business intelligence function for this platform.

We have also been active in disseminating our communications products, which include nine editions of our popular *Newsletter* publication, an updated Legal Obligations Guide

for FARPACTA regulators, and a guidance document for regulators on complying with regulatory criteria for alternatives to Canadian experience. In addition, I made presentations at nine regulator-organized events, as well to groups such as the Conference Board of Canada and the Society of Adjudicators and Regulators of Ontario.

We also consult regularly with officials at MLITSD, the Ministry of Health and other oversight ministries on matters of common interest. I particularly wish to thank Assistant Deputy Ministers Gloria Lee and Dr. Karima Velji, and their officials, for consulting with us on upcoming initiatives and sharing information in a timely fashion.

During the year, my staff and I also met with numerous stakeholders representing internationally trained applicants, the immigration and settlement communities and institutions that offer educational and assessment services to candidates.

The list includes World Education Services, the National Newcomer Navigation Network-N4, the Internationally Trained Dentists Association of Canada, Touchstone Institute, the Ontario Society of Professional Engineers, the National Nursing Assessment Service, and the National Dental Examining Board. We benefited greatly from the insights that we obtained during these discussions.

Despite these positive developments, there is more work that needs to be done to improve fair registration practices. As a rule, it still takes far too long for applicants to move through the required assessment and registration processes. While some regulators have made material progress, others have not.

In addition, registration success rates for internationally trained applicants in some professions remain stubbornly low, which discounts the province's immigration goals and inhibits the ability of applicants to fully apply their skills.

Through the vehicle of our risk-informed compliance framework, our educational efforts, our role as strategic advisors and our ability to influence decision-makers, we are committed to build on the successes that have been achieved to enable skilled candidates to contribute meaningfully to Ontario society and to achieve their dreams.

Before concluding, I wish to thank the many individuals involved in the immigration, settlement, licensure, and regulatory sectors for their continuing work to provide information and guidance to applicants and to improve the transparency and fairness of registration processes.

I also wish to commend the work of OFC staff during this very dynamic period. Although we are a modestly sized agency, we have delivered in a huge way over the last 12 months.

The remainder of this report builds upon the themes that I have identified above. I commend the contents to you.

Sincerely,

Irwin Glasberg
Fairness Commissioner for the Province of Ontario

Mission, Mandate, Principles and Regulator Compliance Obligations

1. Introduction

The Office of the Fairness Commissioner (OFC) is a Government of Ontario agency which performs an important oversight role across the province's regulated professions, regulated health colleges and Skilled Trades Ontario (which we sometimes collectively refer to as regulators). Its mandate is to help ensure that the registration practices of these organizations are transparent, objective, impartial and fair.

The OFC is led by the Fairness Commissioner (the commissioner), whose overall authority is set out in section 13(3) of the [Fair Access to Regulated Professions and Compulsory Trades Act, 2006](#) (FARPACTA) and in Schedule 2 of the [Regulated Health Professions Act, 1991](#) (the RHPA). The former statute governs the registration practices adopted by the 14 non-health regulated professions and Skilled Trades Ontario, while the latter prescribes the practices of the 26 self-regulated health colleges.

The work of the OFC is focused on providing better outcomes for applicants who wish to practice in their chosen trade or profession, whether they have been trained domestically or internationally. Our goal is to help ensure, to the extent possible, that qualified professionals can contribute to Ontario society to the full extent of their skills, training and aptitudes.



Under Ontario's legislative framework for self-regulation, a designated regulated profession or regulated health college assumes responsibility for assessing the qualifications of applicants, licencing them and for governing the professional conduct of its members so that the public interest is served. Applicants must meet the stipulated standards to receive a license to legally work in the occupation and / or to use a professional title.

2. The Four Foundational Principles and General Duty

There are four foundational registration principles set out in section 6(1) of FARPACTA and section 22 (2) of the RHPA, which are collectively described as a general duty. These four principles are summarized below:

Transparency

To be transparent means that a regulator's instructions and guidelines for its registration processes are clear, accurate and straightforward. This degree of clarity is necessary to enable applicants to easily follow the required steps in the process. Transparency also demands the availability of information that can be easily understood with clear milestones to allow applicants to monitor their progress in completing the registration process.

Objectivity

To be objective means that a regulator's tools, assessment criteria, procedures and training processes are designed to enhance the consistency of decision-making across applicants. Such results should be achieved regardless of the individual rendering the decision, the factual context, and / or whether the decision is made by a regulator or a third-party service provider. Decision-making systems should also invest in well-trained and qualified adjudicators to promote sound, valid and reliable decisions.

Impartiality

To be impartial means that a regulator must make its decisions through a process that is free of bias that, if present, could produce subjective or tainted assessments or decisions. Sources of bias could include actual or perceived conflicts of interest, preconceived notions, or a lack of cultural competency. Each regulator is responsible for identifying sources of bias and for taking appropriate steps to address such bias and ensure impartiality, which would normally include enhanced training and the adoption of standard procedures to follow where an issue of bias is suspected.

Fairness

Fairness must sit at the heart of the registration process for applicants who wish to join a profession, health college, or compulsory trade. Fairness comprises several dimensions. It is often contextual in nature and not always amenable to precise definition. It can also overlap with the first three principles discussed.

At its core, fairness means that a regulator needs to identify the steps necessary, and the documentation required, for a candidate to complete the registration process. The assessment must be rational and above-board, and not place unnecessary and ill-conceived obstacles in the way of success. Everyone should have the same prospects irrespective of their country of training or background.

The process needs to be expedient, and there must be a chance for an arm's-length review if the individual disagrees with a decision. Those running the processes should embrace their responsibilities with a spirit of purpose, wisdom, and empathy.

In 2023, section 6 of FARPACTA was expanded to provide for an additional general duty with which a regulated profession must comply. Section 6(2) now specifies that a regulated profession has a duty to work in consultation with its responsible minister "to ensure, as a matter of public interest, that the people of Ontario have access to adequate numbers of qualified, skilled and competent regulated professionals". This provision closely resembles the pre-existing section 2.1 of Schedule 2 in the RHPA.

3. Specific Duties

The elements of the general duty identified above also provide a philosophical underpinning and interpretative framework for applying the more specific duties outlined in the legislation. These more targeted provisions deal with such requirements as:

- 1) Establishing maximum time periods within which a regulator must complete defined aspects of the registration process.
- 2) Ensuring that assessment decisions made by the regulator, or a third-party service provider, are transparent, objective, impartial and fair.
- 3) Enabling applicants to obtain access to records relevant to their files.
- 4) Prohibiting Canadian experience requirements unless certain specified pre-conditions are met.
- 5) Reducing the number of language proficiency tests that applicants must take during the immigration and professional licencing process.
- 6) Addressing barriers to registration in emergency situations.

In some cases, these requirements are expressed differently in FARPACTA and Schedule 2 of the RHPA.

4. Functions of the Fairness Commissioner

The mandate of the OFC is set out in section 13(3) of FARPACTA and 22.5(1) in Schedule 2 of the RHPA. While the wording of the two statutes differs in certain respects, the Fairness Commissioner's core functions are broadly similar in nature. They are to:

- a) assess the registration practices of regulated professions based on their obligations under the legislation.
- b) specify audit standards, the scope of audits and the times when registration practices shall be reviewed.
- c) 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.
- d) 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 the legislation.
 - e) advise regulated professions, government agencies, community agencies, colleges, and universities, third parties and others as the Minister may direct with respect to matters under the legislation.
 - f) advise ministries with respect to matters under the legislation that affect a ministry or a regulated profession that falls under the jurisdiction of the ministry.
 - g) advise the Minister on matters related to the administration of this Act.
 - h) 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
 - i) perform such other functions as may be assigned by the Lieutenant Governor in Council.

The OFC oversees the licensing practices of 41 regulatory bodies. These organizations cover virtually every component of the provincial services sector and economy. Our office also performs a variety of other roles consistent with its statutory mandate. These include disseminating best practices through education and outreach and advising regulators and other stakeholders on how to comply with the legislation.

The OFC also works collaboratively with its MLITSD counterparts to help ensure that Ontario's immigration, labour-market, and domestic labour mobility goals for the employment of professionals and skilled tradespersons are met.

While the legislation prohibits the Fairness Commissioner from becoming involved in individual registration decisions, internal reviews or appeals, the office may choose to pursue individually reported fair registration issues that are repetitive in nature or that display a systemic dimension. We continue to remain active in this sphere.

In fulfilling this mandate, the OFC seeks to identify artificial or systemic barriers that can impede the ability of qualified applicants to work in their chosen profession or compulsory trade. These barriers are especially problematic for internationally trained applicants whose competencies will be discounted unless regulators incorporate fair and progressive practices into their registration schemes.

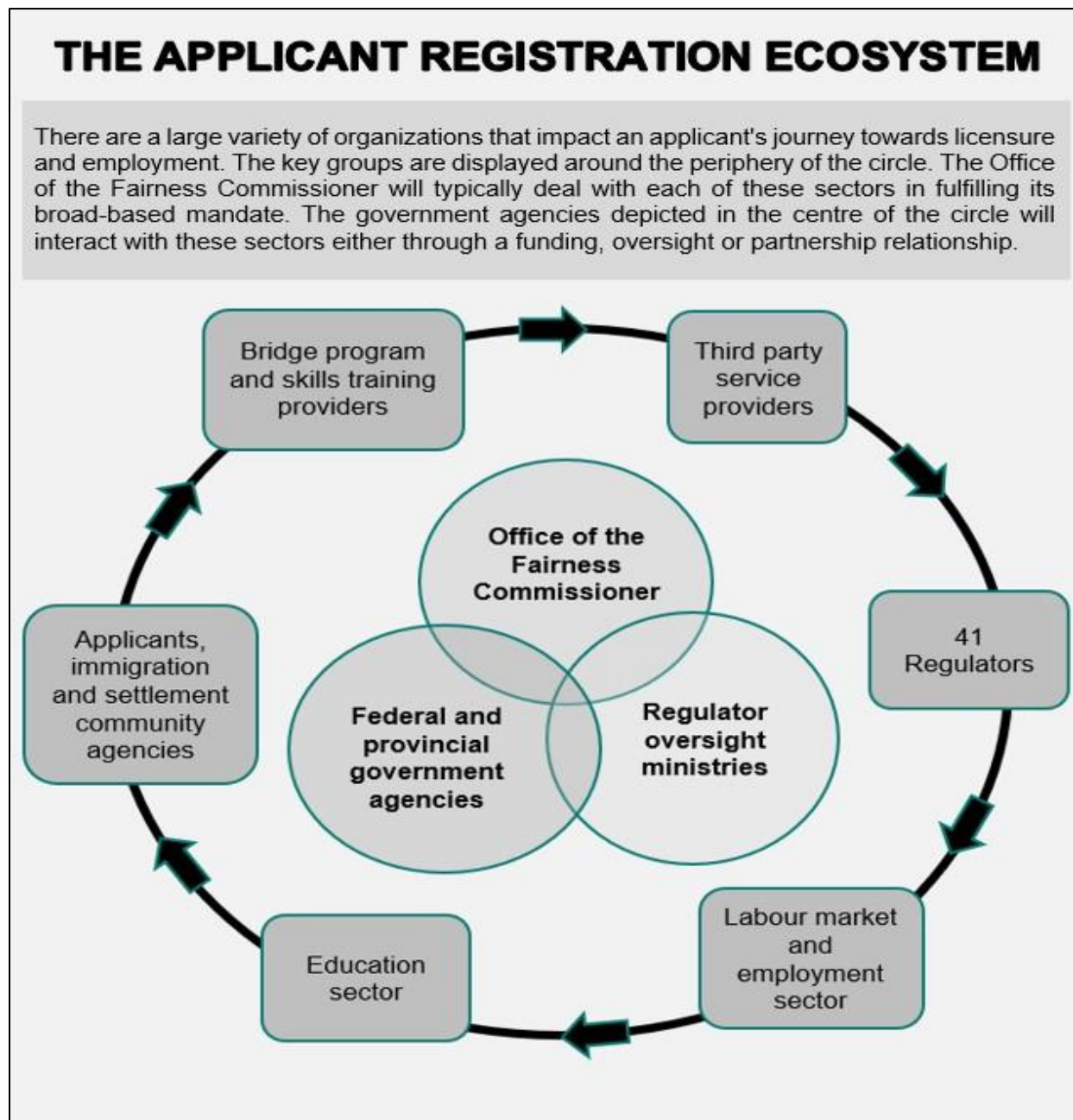
Since the OFC was established in 2007, the office's methods of operation have evolved and now focus on applying a risk-informed compliance framework, disseminating best practices, influencing legislative and regulatory change, and consulting with regulators on proposed adjustments to their fair registration practices.

During this continuing journey, our office has taken important steps to become a modern and responsive regulator, and to adopt evidence-based policy initiatives. In

addition, as evidence of our increasing relevance, the government has provided the Fairness Commissioner with an expanded set of legislative authorities.

5. The Applicant Registration Ecosystem

The OFC interacts with a complex ecosystem that is associated with an applicant's journey through a series of immigration, education, credentials assessment, registration, licensing, and employment processes. The various participants, and when and how they interact with applicants, are depicted in the circular journey map that follows.



While our office regularly engages with many stakeholders, our relationships with Ontario's 41 regulators are particularly important as these organizations are directly accountable for implementing fair registration practices. Over the past year, we have engaged with regulators on numerous key initiatives such as adding new professions to their legislative mandates, ways to optimally implement recent amendments to FARPACTA and the RHPA and their regulations, and proposals to update our risk-informed compliance framework.

We also obtained valuable feedback on the questions that we pose in our annual Fair Registration Practices reports and on the design of our new data portal through which this information is collected. These discussions have materially improved the quality and relevance of our work products.

Finally, we meet regularly with organizations that represent the interests of domestically and internationally trained applicants to the professions, third party service providers, government officials and professional associations.

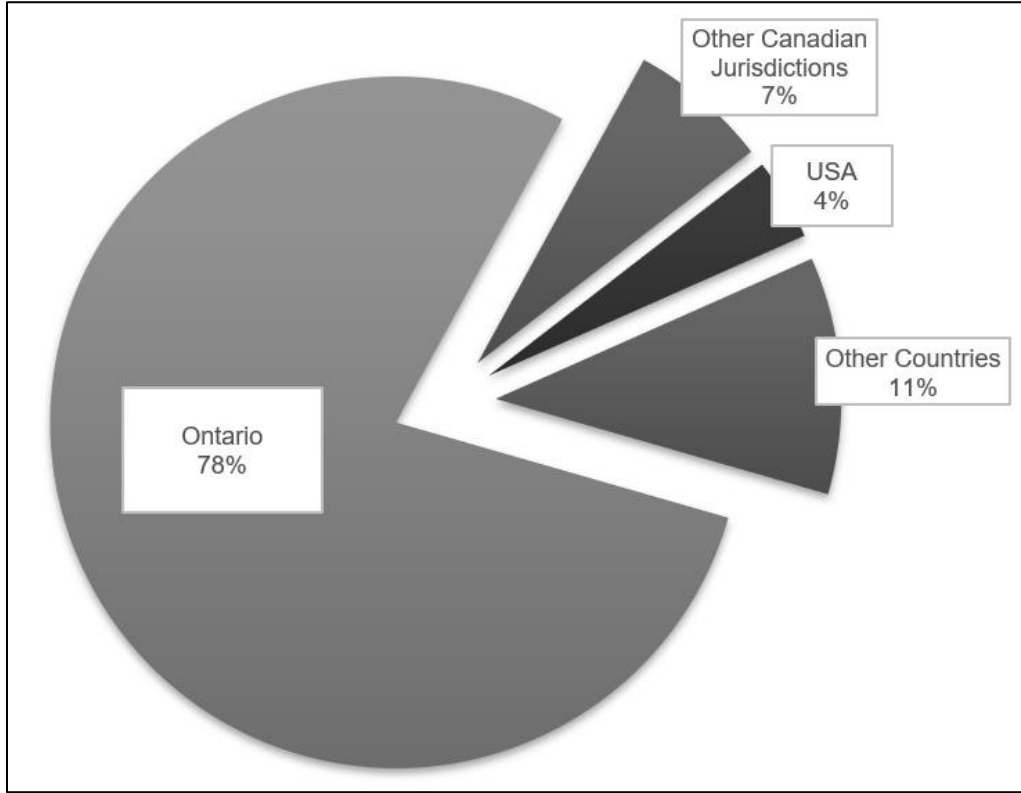
6. Statistics Derived from Fair Registration Practices Reports (FRPs)

The provisions of FARPACTA and the RHPA require that each regulator submit an FRP at such times as the Fairness Commissioner may specify. These reports, which are typically requested on an annual basis, provide key statistics on applicant and membership trends across professions and skilled trades, along with steps that regulators have taken to improve their registration practices.

During the 2023-24 period, we received the FRPs for the 2022 calendar year from regulators. The OFC plans to disseminate its 2023 FRP templates in April 2024, with responses due in June 2024. Our goal is to return to the regular annual reporting cycle in 2025, whereby reports for the calendar year ending December 31 are due in March of the following year.

What follows is a compilation of some key statistics, derived from the 2022 data, plus a discussion of underlying trends.

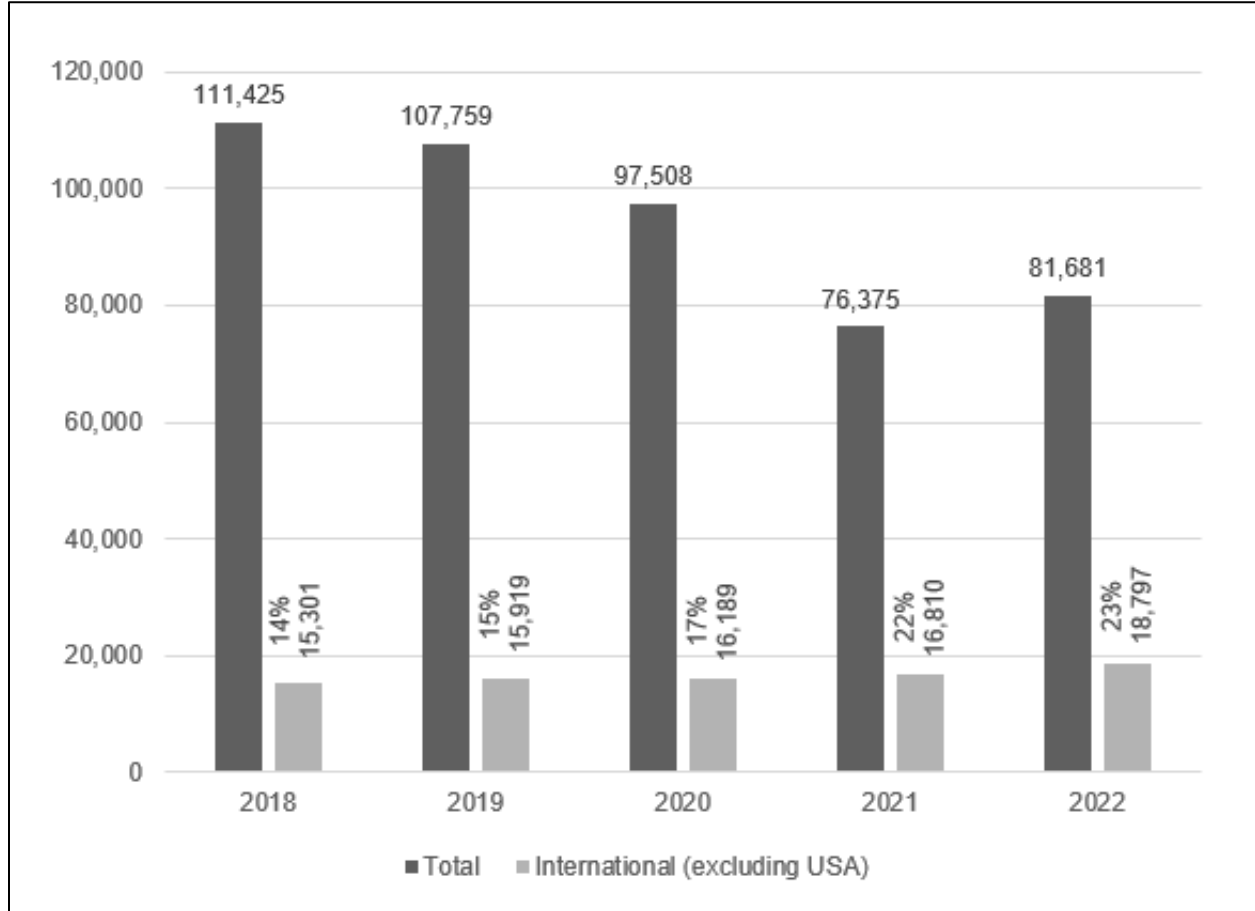
Members of Regulated Professions, Regulated Health Colleges and Compulsory Trades – Place of Initial Training



For the purposes of this discussion, a *member* is defined as an individual who has satisfied the requirements for registration and has been granted the right to practice and / or to use a professional title.

In 2022, Ontario regulators reported a cumulative, total membership of 1.2 million individuals. Of these, 1.0 million formed part of the professions and 205,000 belonged to the compulsory trades. Most members (78%) received their initial training in Ontario, while 15% and 7%, respectively, obtained their training outside of Canada or in another Canadian jurisdiction.

Applications to the Regulated Professions, Regulated Health Colleges and Compulsory Trades over the Last Five Years

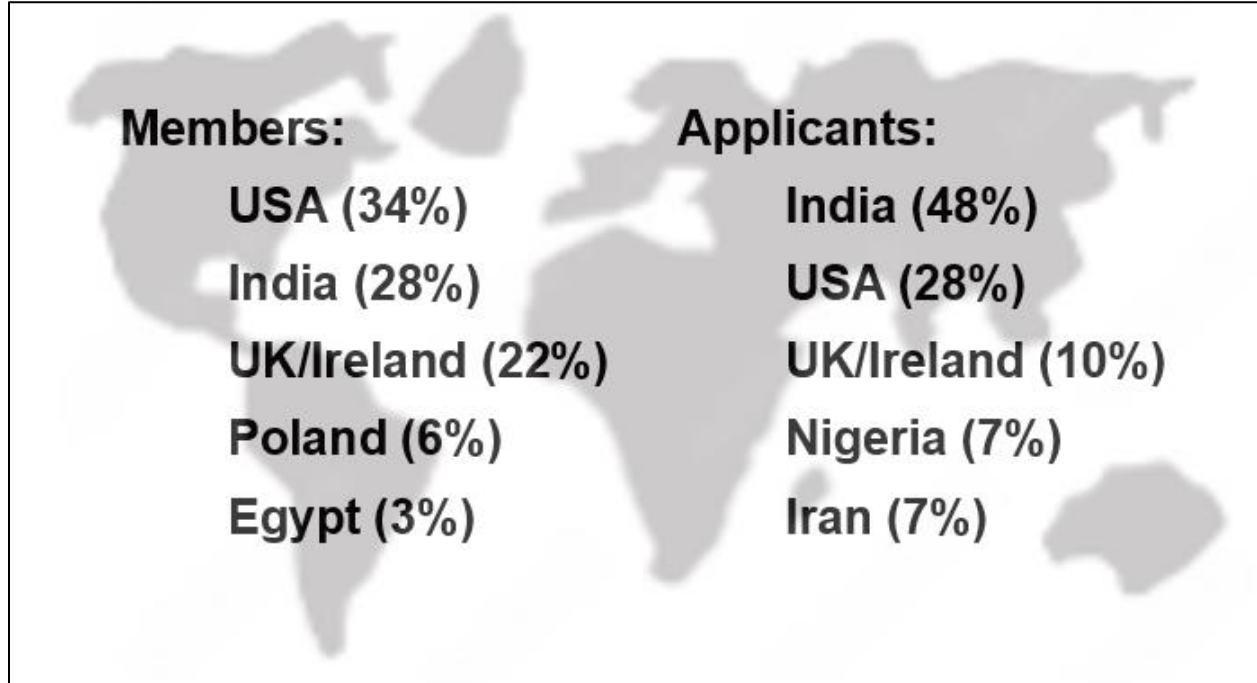


An *applicant* for current purposes is defined as an individual who has applied for a license or certificate to practice their profession / trade, and / or to use a professional designation or title.

From 2018 to 2022, the trend data reveal that total applications to the professions and skilled trades dropped materially in 2020 and 2021 during the Covid-19 pandemic but have begun to recover.

In addition, both the number and proportion of internationally trained applicants, as percentages of total applicants, have increased steadily from 15,301 (14%) in 2018 to 18,797 (23%) in 2022. While the specific factors underlying this trend will need to be assessed more carefully, the OFC believes that both the province's immigration policies and the maturation of fair registration practices have contributed to this result.

Top Five Countries of Initial Training for Applicants and Members in 2022



For the professions, approximately 15% of all members received their initial training outside Canada. This compares to about 5% of skilled tradespersons, who obtained their Certificates of Qualification based on recognition of international trades experience (estimate based on data compiled between 2013 and 2022). The top three countries of initial training for professionals from outside of Canada, in rank order, were the USA, India and UK/Ireland, compared to India, Iran and China for the skilled trades.

On the applicant side, in 2022, the professions and skilled trades received a total of 81,861 applications. Of this figure, approximately 23% of total applicants received their education / training outside of Canada or the USA, with top countries of origin identified as India, followed by the UK / Ireland, Nigeria and Iran.

**Membership of Internationally Trained Individuals
in Ontario's Six Largest Professions**

Profession	Total Number of Members	Internationally Trained Individuals		Top Country of Initial Training
		Total Number	% of Total	
Teachers	229,268	38,442	17%	USA
Nurses	199,111	30,123	15%	India
Accountants	100,879	5,881	6%	India
Engineers	86,516	27,502	32%	India
Lawyers	62,155	7,159	12%	UK
Physicians	43,060	13,834	32%	Ireland

For the purpose of this table, *internationally trained individuals* (ITIs) are those individuals who have obtained their professional education or trades experience outside of Canada. The term covers both immigrants and Canadians who studied abroad.

The OFC's Accomplishments

During the year, the OFC took important steps to solidify its reputation as a more modern, responsive, and strategic regulator. In this section, we highlight some of our achievements.

1. Operationalizing our Risk-informed Compliance Framework

In April 2021, the OFC launched the first phase of its Risk-informed Compliance Framework (RICF) as a more effective way to allocate its finite compliance resources and in view of the increasing maturity of many regulators. In April 2022 and, following a 12-month transition period, the framework fully came into effect.

As part of this approach, the OFC undertook an analysis of each regulator's historical performance and risk environment to identify a cumulative risk rating. These ratings fell into three categories:

1. Low risk.
2. Moderately low risk.
3. Moderate to high risk.

Each risk rating was, in turn, associated with a set of compliance tools that the OFC could choose to apply depending on a regulator's particular circumstances. The plan was to devote the bulk of the office's compliance resources to regulators in the higher risk categories.

Based on the risk assessment exercise, the OFC placed 31 regulators in the low-risk category, an additional five in the moderately low risk category and a final grouping of three in the moderate to high-risk category. The figures do not add up to 41 as the OFC considered that two regulators had not reached a sufficient stage of organizational maturity to usefully participate in this process. These risk ratings remained in place until March 31, 2024.

The OFC subsequently published a full list of risk ratings in its [2022-23 annual report](#), along with the steps that each of the higher risk regulators had taken to improve their registration practices. To date, the OFC has concluded that the RICE is a useful vehicle to prioritize its compliance work and to promote informed discussions on risk identification and mitigation strategies.

Based on the lessons learned from the first risk assessment cycle, and following consultations with regulators, the OFC decided to make four changes to the second iteration of the RICE, which would apply to the 2024 to 2026 rating cycle.

These adjustments are summarized below:

- The risk assessment methodology will no longer focus on the historical performance of a regulator but will be based exclusively on forward-looking risk factors.
- The OFC has removed two of the original risk factors: response to emergency situations such as the COVID-19 pandemic, and over-reliance on Canadian experience requirements and substituted two new ones:
 - impact of major changes to registration practices and relations with third-party service providers, and
 - ability of the regulator to comply with newly Introduced legislative and / or regulatory obligations.

Based on these adjustments, the OFC's refreshed risk factors are now framed as follows:

- Organizational capacity.
- The overall control that a regulator exerts over its assessment and registration processes, and its relations with third-party service providers (TPSPs).
- Impact of major changes to registration practices and relations with TPSPs.
- Ability of the regulator to comply with newly introduced legislative and / or regulatory obligations.
- Public policy considerations that address labour market shortages and the regulator's ability to promote inclusion and address anti-racism concerns in its registration processes.

In addition, to enhance procedural fairness in the second risk cycle, the OFC shared provisional risk letters with higher risk regulators for comment before their ratings were finalized.

Please refer to our updated Risk-informed Policy [Framework](#) for further details, and to [Appendix A](#) of this document for details on risk categories and associated compliance tools. As a supplement to the new framework, the OFC has made available two new *Legislated Obligations and Fair Registration Best Practices Guides*, one for the regulated professions and compulsory trades, and the second for the regulated health colleges:

- [Legislated Obligations and Best Practices Guide - Regulated Professions and Compulsory Trades](#)
- [Legislated Obligations and Best Practices Guide - Health Regulatory Colleges](#)

In March 2024, the OFC updated the first of these guides to include the first tranche of new FARPACTA legislative amendments.

Based on the application of the new risk factors, Table 1 below describes the 2024-2026 distribution of risk ratings for both health and non-health regulators.

**Table 1: Percentage Distribution of Risk Ratings
for the 2024-2026 Risk Assessment Cycle ***

Risk Rating	Number of Regulators in this Category	Percentage of Regulators in this Category
Low Risk	32	82%
Moderately Low Risk	4	10%
Moderate to High Risk	3	8%
Totals	39	100%

* Please note that that the OFC did not assign risk ratings to either Skilled Trades Ontario or the Health Supportive Care Providers Oversight Authority since these organizations were either in transition or newly established.

When compared to the first risk cycle, three regulators obtained lower risk ratings, while the risk ratings of two others increased. Further details are found in Tables 2 and 3 below. Please note that these risk ratings will apply until March 31, 2026.

The three most prevalent risk factors that the OFC identified during this cycle pertained to addressing labour market shortages, the control that regulators exercised over their assessment and registration processes and their TPSPs, and the impacts of major changes to registration processes. The OFC will continue to analyze these trends as this risk cycle matures and develop appropriate guidance materials for regulators and disseminate associated best practices.

With this background in mind, Table 2 below describes how individual regulators fared during the second cycle of the RICF process. To contextualize the contents of this table, it would be important to elaborate on the meaning and purport of these risk ratings.

The first point is that the designation of a regulated profession or health college as higher risk does not mean that the regulator is failing to take reasonable measures to improve its registration practices. It may, in some cases, indicate that a regulator's mandate is particularly dynamic with numerous change management initiatives underway. Such work necessarily attracts implementation risks, which constitute discrete components of the OFC's risk-informed compliance framework.

In fact, several of the regulators identified on this list have made significant strides to enhance their registration frameworks and / or to work with their third-party service providers to achieve similar objectives. In some cases, however, these initiatives will take substantial periods of time to complete, which necessitates a higher risk profile for these organizations.

As well, certain of our risk factors, particularly the one that involves addressing labour market shortages, can be idiosyncratic to individual professions and not easy to resolve. For clarity, the OFC recognizes that individual regulators cannot solve labour market shortages on their own, but we look to them to address unreasonable barriers in the registration process and to actively work with other parties in the ecosystem to help ensure an adequate supply of competent professionals.

The OFC also wishes to reinforce that a principal objective of this framework is to help our office allocate its finite resources to regulators where we believe that we can achieve the best and highest value outcomes.

In our last annual report, which was published at the *end* of the first risk assessment cycle, we also commented on the many steps that regulators had taken over the past two years to improve their registration practices. As we *begin* the second cycle, we have not included similar information. Suffice it to say, however, that each regulator referred to in the table continues to work diligently to improve its practices and to engage constructively with our office.

Table 2: Individual Regulator Risk Ratings for the 2024 -2026 Risk Cycle

FARPACTA Regulators	Low Risk	Moderately Low Risk	Moderate to High Risk
Association of Ontario Land Surveyors	✓		
Chartered Professional Accountants of Ontario	✓		
College of Early Childhood Educators	✓		
College of Veterinarians of Ontario	✓		
Human Resources Professionals Association	✓		
Law Society of Ontario	✓		
Ontario Association of Certified Engineering Technicians and Technologists	✓		
Ontario College of Social Workers and Social Service Workers	✓		
Ontario College of Teachers	✓		
Ontario Professional Foresters Association	✓		
Professional Geoscientists of Ontario	✓		
Ontario Association of Architects			✓
Professional Engineers Ontario			✓

RHPA Regulators	Low Risk	Moderately Low Risk	Moderate to High Risk
College of Audiologists and Speech-Language Pathologists of Ontario	✓		
College of Chiropractors of Ontario	✓		
College of Chiropractors of Ontario	✓		
College of Dental Hygienists of Ontario	✓		
College of Dental Technologists of Ontario	✓		
College of Denturists of Ontario	✓		
College of Dieticians 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 and Imaging Technologists of Ontario	✓		
College of Midwives of Ontario	✓		
College of Naturopaths of Ontario	✓		
College of Occupational Therapists of Ontario	✓		
College of Opticians of Ontario	✓		
College of Physiotherapists of Ontario	✓		
College of Registered Psychotherapists of Ontario	✓		
College of Respiratory Therapists of Ontario	✓		
College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario	✓		
Ontario College of Pharmacists	✓		
College of Nurses of Ontario		✓	

College of Optometrists of Ontario		✓	
College of Physicians and Surgeons of Ontario		✓	
Royal College of Dental Surgeons of Ontario		✓	
College of Psychologists of Ontario			✓

Table 3 below tracks changes in regulator risk ratings from the initial to the current 2024-2026 risk assessment cycle.

Table 3: Changes in Regulator Risk Ratings

Name of Regulator	Initial Risk Rating	2024-26 Risk Rating
Association of Ontario Land Surveyors	Moderately Low	Low
College of Homeopaths of Ontario	Moderately Low	Low
College of Physiotherapists of Ontario	Moderate to High	Low
College of Optometrists of Ontario	Low	Moderately Low
Ontario Association of Architects	Low	Moderate to High

Please see [Appendix B](#) for a list of the risk factors that prompted the OFC to place the seven regulators referred to in Table 2 in an elevated risk category.

2. Overseeing the Enactment of New Legislative Amendments

The First Tranche of FARPACTA and RHPA Amendments

Through the enactment of several bills, the provincial government has introduced four tranches of legislative amendments to modernize FARPACTA and, in some cases, Schedule 2 of the RHPA. The impact of these changes has been to reduce barriers to licensure that both domestic and internationally trained applicants often encounter in their licensure journeys and to modernize the compliance provisions in the legislation.

Between 2021 and 2022, the legislature passed the first series of FARPACTA amendments. These provisions, contained in Bill 27, Working for Workers Act, 2021 and Bill 88, Working for Workers Act, 2022, were designed to eliminate unnecessary Canadian experience requirements (CER), establish maximum time periods within which a regulated profession must make certain notification, registration and appeal decisions, reduce the number of language proficiency tests that applicants must take during immigration and licensure processes and address barriers to registration in emergency situations.

While the goals of the companion RHPA amendments are similar, they have been framed differently from the FARPACTA provisions. In addition, while the OFC currently oversees how professional regulators will implement the new FARPACTA amendments, MOH officials are responsible for this role for the regulated health colleges.

Since the new legislative and regulatory provisions were enacted, OFC staff have met with regulators frequently to explain the nature of the new requirements, track compliance and share insights and best practices. Our agency has also developed several new guidance notes for FARPACTA regulators to understand and apply these new provisions.

During the most recent 12 month-period, we have added to this collection by providing a guidance note entitled *Information and Advice to Regulators on Alternatives to Canadian Experience*. Below, we have summarized further details of our implementation activities regarding these new legal obligations.

Canadian Experience Requirements

Under the new amendments, regulated professions were given two years, until December 3, 2023, to remove any pre-existing CERs. Additional provisions allowed regulators to seek an exemption from this requirement for reasons of public health and safety or to introduce an alternative that met certain stipulated regulatory criteria.

At the time that the original legislation passed, there were five regulated professions that, in the OFC's view, had established mandatory CERs.

Both Professional Engineers Ontario and Professional Geoscientists Ontario have since removed their CERs. These regulators now require both domestic and internationally trained applicants to complete competency-based assessment processes, where candidates must provide examples of previous professional work that demonstrates the experiential skills necessary to competently practice their professions in Ontario.

The Ontario Association of Architects (OAA) and the Association of Ontario Land Surveyors (AOLS) have decided to retain their CERs but have introduced alternatives, consisting of competency-based assessments, course work or other learning opportunities relevant to professional practice in Ontario.

The OFC has examined both sets of CER alternatives. While implementation of these schemes is still underway, our office believes that the AOLS scheme substantially complies with the criteria set out in the CER regulation. In the case of the OAA, our office is continuing to evaluate this regulator's approach.

The OFC will continue to provide guidance to these regulators to ensure that their alternatives comply with the legislation and encourage all regulated professions to apply an applicant-focused lens to their CER alternatives.

The Law Society of Ontario (the LSO) currently requires that all applicants to the legal profession complete an experiential training requirement, through either an eight-to-ten-

month articling placement or via the eight-month Law Practice Program. These options must be completed in Ontario.

For many years, the LSO has made available a process for lawyers trained and licensed in common law jurisdictions to seek an abridgement or exemption from the articling process, which, to the regulator's credit, is often granted. This process is not, however, available, to lawyers trained and licensed in civil law jurisdictions (except for Québec). The OFC plans to engage further with the LSO to explore whether the regulator could make the exemptions process more broadly available.

The FARPACTA regulatory scheme also allows a regulated profession to seek an exemption from complying with its CER-related obligations based on public health and safety grounds. To do so, the regulator must make a formal request to the Fairness Commissioner who is then required to make a recommendation to the MLITSD minister on whether to approve the application. The minister will then review this advice and make the final decision.

To date, the OFC has received one such exemption request filed by the OAA, where the regulator sought an exemption from the prohibition against retaining a CER for reasons of public health and safety in accordance with the regulations. The former MLITSD minister delegated this decision-making function to the Fairness Commissioner who determined that the exemption should not be granted based on the reasons set out in his decision letter.

Making and Communicating Timely Registration Decisions

Commencing on April 1, 2023, all FARPACTA regulators are required to communicate registration decisions to Domestic Labour Mobility Applicants (DLMAs) within 30 days of receiving an application and “everything required by the regulated profession in respect of the application”.

There is also a companion legal obligation respecting ITIs where, beginning on July 1, 2023, each regulated profession must communicate its registration decisions to these candidates within six months, in 90% of all cases.

Similar to the CER scheme, a regulated profession may apply for an exemption from the time limit requirements in accordance with the regulations. The OFC received one such application from the Ontario College of Social Workers and Social Services Workers (the OSWSSW or college).

In his advice, the Fairness Commissioner recommended that the college be granted a modest exemption until November 1, 2023, to enable it to fully deploy its new client relationship management system and increase its staffing complement to meet both registration time limits. The former MLITSD minister accepted this recommendation. The college has since completed the necessary changes and met the time limit requirement.

With respect to system-wide compliance with these time limits, in November 2023, the OFC canvassed all regulated professions to ascertain how well they were processing applications received from DLMAs between April 1 and September 30, 2023.

The survey results revealed that approximately 98% of all DLMAs obtained a registration decision within the stipulated 30-day period, with 91% of the cohort approved to practice in Ontario. The remaining 2% received their decisions between 31 to 74 days.

By contrast, baseline data that regulators submitted to the OFC in 2022 -- which predated the new legislation -- revealed that only eight of 14 FARPACTA regulators reported an average processing time of less than 30 business days. Two were at or above 30 business days, and four were unable to provide this data. Following the enactment of the regulation, all regulators have now developed the required reporting capacity.

In the OFC's view, these results demonstrate that the introduction of more prescriptive registration time limits has contributed to the more efficient registration of DLMAs.

In Spring 2024, we plan to solicit complementary data on the ability of regulators to issue registration decisions for ITIs within the required six-month standard. We were obliged to proceed with data gathering in two stages because the ITI-related obligations came into effect later, on July 1, 2023, and are subject to a six-month calculation period.

Streamlining Language Proficiency Testing

In 2021, the government further amended FARPACTA to introduce new legal obligations pertaining to English and French language proficiency testing. These changes are important since applicants trained outside of Canada have historically been subject to duplicative and costly language proficiency testing at different stages of their immigration and registration journeys.

The government proceeded to operationalize this provision by adding section 4 to Ontario Regulation 261/22 made under FARPACTA. This provision requires that regulators accept any of the language tests used by Immigration, Refugee and Citizenship Canada (IRCC) for immigration purposes and to retain the currency of these tests for longer periods of time.

To monitor compliance with this obligation, the OFC scanned each regulator's website to determine whether they were clearly informing applicants that any of the IRCC approved tests could also be used to satisfy registration requirements. Owing to this proactive compliance work, several regulators updated information on their websites, or obtained policy approvals from their councils to make these changes.

As of March 31, 2024, all FARPACTA regulators have complied with the new language proficiency requirements.

Since these requirements resemble those contained in Schedule 2 of the RHPA, the OFC completed a similar compliance exercise for the 26 regulated health colleges.

There is now virtually full compliance with these regulatory provisions in the health sector, and some early coordination has taken place with pan-Canadian bodies to adjust language proficiency testing requirements at the national level.

Further Rounds of Legislative Amendments

In October 2023, the legislature proclaimed into force Bill 79, Working for Workers Three Act, 2023 which introduced several further important amendments to FARPACTA. We summarize two of these below.

First, the legislation specifies that a regulated profession has a duty to work in consultation with its responsible minister “to ensure, as a matter of public interest, that the people of Ontario have access to adequate numbers of qualified, skilled and competent regulated professionals”.

The amendment mirrors the existing wording found in section 2.1 of Schedule 2 of the RHPA. This provision is important as it recognizes the need for regulated professions to work with their responsible ministers to help achieve the province’s labour market goals.

It also underscores the OFC’s often stated position that all parties involved in the licencing of professionals and skilled tradesperson must work collaboratively to improve the fairness and efficiency of licensure processes.

Second, the bill expands upon previous FARPACTA amendments relating to Canadian experience requirements by specifying that “a regulated profession may accept Canadian experience in satisfaction of a qualification for registration only if it also accepts alternatives to Canadian experience that meet the criteria prescribed by the regulation”. The government subsequently enacted section 1.1 of Ontario Regulation 261/22, which sets out these considerations.

In March 2024, Bill 149, Working for Workers Four Act, 2023, received Royal Assent. The legislation contains two discrete but inter-related amendments. First, the legislation specifies that a regulated profession must meet minimum prescribed requirements to ensure that it assesses applicant qualifications in a way that is transparent, objective, impartial and fair.

Second, the legislation addresses the situation where the regulator has delegated these responsibilities to a third-party service provider (TPSP). In these cases, the regulated profession must meet minimum prescribed requirements to ensure that it has taken reasonable measures to ensure that the assessments are made in a way that is transparent, objective, impartial and fair.

The OFC believes that the introduction of these amendments, particularly as they relate to the oversight of TPSPs, is critical given that Ontario regulators have increasingly devolved important components of their assessment, examination, and registration processes to these entities. There is a particular need to ensure that applicants experience a comparable level of transparency, fairness, efficiency, and client service whether their qualifications are assessed by a regulator directly or one of its TPSPs.

The legislation also authorizes the government to enact regulations to identify the prescribed requirements. The OFC has been invited to consult into this process. Our office will also continue to work with individual FARPACTA and RHPA regulators to strengthen their accountability schemes and to encourage TPSPs to apply progressive client service principles to their service offerings.

The Development of the OFC Data Portal

As part of its oversight role, the OFC requires that regulators submit annual Fair Registration Practices reports (FRPs). For several years, the OFC has worked towards developing a data portal to digitize the FRP process.

In March 2024, the OFC released the first version of the data portal, which focuses on enabling regulators to more easily complete and submit their FRP reports.

This digital platform makes reports more straightforward to compile and simpler for OFC staff to access. It also enhances the integrity, security, and quality of the reporting, and creates a “user-friendly” interface for both internal and external clients. The OFC consulted widely with regulators in developing the portal to generate ideas and identify issues from an end-user perspective. The key features of this first release include:

- Allowing regulators to submit data for multiple professions or trades in a single report.
- Enabling multiple users to enter the organization’s information at the same time.
- Permitting users to save, and return to, the digital form at any time.
- Allowing regulators to download a copy of the report to assist them with final internal reviews and approval of data before they submit their forms.

In addition, further upgrades to the portal will substantially enhance the OFC’s data management and analytics capacity, through the addition of Microsoft Power BI data dashboards.

3. OFC Outreach Initiatives

During 2023-24, the OFC continued to rely on a variety of communications vehicles to provide timely information to our many stakeholders. We issued nine editions of our popular *OFC Newsletter* publication, made presentations to regulators at numerous council meetings, and participated with stakeholders at conferences and related events.

The OFC Newsletter editions featured more than 20 articles. The topics that we covered included new legislation updates, profiles on regulators that are making a difference and infographics highlighting FRP data. Our *Newsletter* publications can be accessed by clicking on [OFC Newsletter Archives](#) on our internet site.

In addition, the Fairness Commissioner has spoken at nine regulator organized events, including council meetings and gatherings of registration committees. During these sessions, the commissioner will typically discuss the role of the OFC, breakthrough registration practices and opportunities for regulators to enhance their processes.

Breakthrough Initiatives to Enhance Fair Registration Practices

In this section of our annual report, we highlight five breakthrough initiatives that Ontario regulators, or affiliated organizations, have undertaken to improve their fair registration practices. These snapshots provide examples of the work underway across the sector to break down barriers preventing qualified applicants from obtaining licensure.

Removing Canadian Experience Requirements -- Professional Engineers Ontario

On March 31, 2023, the Council of Professional Engineers Ontario (PEO) passed a motion to become the first regulated profession in the province to remove its Canadian experience requirement (CER) in direct response to recent legislative amendments made to FARPACTA. In PEO's case, its CER involved a one-year employment requirement, to be completed under the supervision of a PEO member.

Historically, many internationally trained engineers (ITEs) experienced difficulties acquiring this experience. In addition, the Ontario Human Rights Commission considered these provisions to be, *prima facie*, discriminatory in nature.

To address this situation, PEO decided to migrate to a competency-based assessment (CBA) scheme, modelled after the Competency-based Assessment Candidate's Guide that the Association of Professional Engineers and Geoscientists of Alberta had previously adopted. The CBA model relies on an objective scoring framework for applicants to self-assess and for validators to further assess their experiential skills, typically based on a supervisory relationship with applicants and their work. Two PEO assessors, in turn, review the cumulative information that each applicant provides.

While PEO acknowledges that certain components of "Canadian experience" are understandably unique to Canada (e.g., specific provincial codes, standards, and regulations), it believes that these knowledge gaps can be mitigated through such modalities as employer supervision, government permit / report reviews and PEO's mandatory continuing professional development requirements.

In addition, under the CBA framework, ITEs can now document knowledge and experience of engineering codes and standards used in Canada or equivalent standards, such as the ISO standards used globally.

In pursuing this new path, PEO Council wished to demonstrate, in an open and public manner, that it is complying with the new legislative framework and is committed to overseeing an engineering profession that is more equitable, diverse, and inclusive.

Registering Internationally Educated Teachers in 60 days -- Ontario College of Teachers)

In August 2023, the Ministry of Education amended section 3 of Ontario Regulation 271/09 made under the *Ontario College of Teachers Act 1996* to require that internationally educated teachers (IETs) receive registration decisions within 60 business days from submitting all required supporting documents and evidence, to the satisfaction of the Registrar. This timeline is shorter than the six-month standard set out in FARPACTA. These changes came into effect on December 31, 2023.

To respond to this new requirement, the Ontario College of Teachers (the “college”) adopted a phased approach by identifying, planning, gathering, and coordinating the resources needed to shift to the new registration decision timeline and to implement the related solutions necessary to realize its targets.

In January 2024, the College updated the application process for all applicants for certification. These updates are responsive to the new regulated timeline and align with the college’s ongoing efforts to streamline and improve the application process more broadly.

In particular, the college modified its application processes by implementing a front-loaded approach for application requirements. This new process emphasizes the applicant's responsibility to prepare their documentation before starting the application process and includes additional self-serve features. This new process also applies to, and will benefit, all college applicants.

To successfully implement this new framework, the college has, among other things:

- Implemented an audit procedure to conduct a holistic review of all documentation received to detect any additional information required prior to its evaluation process.
- Streamlined its alternative document procedure to support IETs who are unable to obtain required documentation due to circumstances beyond their control.
- Implemented an electronic document upload portal to enable applicants and third parties to submit their documents directly to the college, in a secure and efficient manner.
- Adjusted the validity period of an application from two years to one year, allowing the college to focus on applications that are ready to be processed.

When updating its registration practices, the college proactively communicates with applicants, potential applicants, and relevant stakeholders alike, through various channels. For example, it launched a robust communications campaign well ahead of the introduction of the new online application process on January 2, 2024.

Practice Ready Ontario: A New Pathway for Internationally Trained Physicians -- Touchstone Institute and Other Partners

In June 2023, Touchstone Institute inaugurated the new Practice Ready Ontario (PRO) program. PRO offers experienced internationally trained physicians (ITPs) a streamlined pathway to licensure and independent practice. Physicians are eligible to apply to this program if they have completed a residency position and worked in general practice, or family medicine, outside of Canada. The Ministry of Health provides funding for this program.

The first step of this multi-phased assessment program involves assessing ITP applications for eligibility and inviting eligible applicants to participate in multiple mini-interviews to help determine candidacy for the program.

Successful candidates then participate in a two-week “orientation to practice in Ontario” program, before they move into a 12-week practice-based clinical field assessment, with oversight by physician assessors in a variety of relevant practice settings. Finally, they complete a three-year return of service in a rural or underserved Ontario community working under a supervisor.

This design framework helps to ensure that there is a thorough assessment of the skills and experience necessary for candidates to practice independently as a family physician in a non-urban setting, while introducing candidates to diverse aspects of rural family medicine.

The PRO program is supported by strong partnership relationships. The program is facilitated by Touchstone Institute, working closely with the College of Physicians and Surgeons of Ontario and Ontario Health. More than 200 health system organizations and experts have participated in program development, with many more involved in implementation, including dozens of clinical field assessors across the province.

The first cohort of candidates is scheduled to complete their clinical field assessments in Fall 2024, with two additional groups targeted to achieve this milestone in late 2024 and 2025, respectively. It is expected that 100 ITPs in total will become qualified to work as family physicians in rural and underserved areas of the province.

ITPs and other stakeholders are embracing PRO. As the pilot progresses, program partners are committed to ongoing evaluation and consultation to ensure continuous improvement. Among the areas to be explored are a better understanding of the candidate experience and a review of eligibility criteria. It is expected that program enhancements will improve transparency and fairness for applicants, encourage potential program scaling and ultimately enable more Ontarians to gain access to a family physician.

Enabling Cross Provincial Practice --The College of Audiologists and Speech-Language Pathologists of Ontario

In July 2022, the College of Audiologists and Speech-Language Pathologists of Ontario (the college or CASLPO) introduced its Cross Provincial Practice (CPP) certificate (the

certificate). Five provinces participate in this initiative, which is designed to improve access to care by allowing registered audiologists and speech language pathologists to offer services in more than one province.

Under this framework, fully registered audiologists and speech-language pathologists from Alberta, Saskatchewan, Manitoba and New Brunswick can follow a simplified application process to enable them to practice Ontario. A CPP certificate allows these out-of-province certificate holders to deliver up to 200 hours of care annually in Ontario.

The college expects that this initiative will help to address the shortage of audiology and speech-language pathology services in remote and underserved areas, reduce wait times, enhance labour mobility, and support continuity of care for patients who move to and from other provinces.

This scheme will also benefit patients who require follow-up care while traveling. These individuals can now receive these supports from their original service providers, helping to promote consistency in treatment and better health outcomes.

In addition, the CPP will allow practitioners to provide services both in person and virtually, broadening the scope of care and making it more convenient for patients to receive the help that they need by removing traditional geographic barriers.

Finally, the lower fees associated with this certificate make the CPP an economically viable option for professionals seeking to expand their practice areas.

Proactively Engaging Stakeholders to Increase Labour Supply: College of Early Child Educators (CECE)

In March 2022, Ontario signed on to the Canada Wide Early Learning and Child Care Agreement (CWELCC). The objectives of this agreement are to, among other things, increase access to licenced child-care spaces and to augment the number of registered early childhood educators (RECEs) in the workforce.

To achieve these goals, it will be necessary to overcome some substantial labour market challenges. For example, the Ministry of Education has estimated that the child-care sector will need to hire an additional 15,000 RECEs by 2026 to meet the CWELCC commitments. The College of Early Childhood Educators (CECE) estimates that there will be a shortfall of more than 8,500 RECEs against this hiring target, should current workforce trends continue.

Like other regulatory bodies, CECE's mandate is to serve the public interest. Building on the obligation contained in section 6(2) of FARPACTA, CECE has also recognized that it best fulfills the public interest when families have access to a qualified and supported workforce in sufficient numbers to provide high-quality early learning experiences to young children.

CECE has actively leaned into the profession's labour supply issues. In addition to participating in government led consultation tables at the federal level, the college has

worked with the post-secondary education sector to strengthen the pool of eligible applicants for registration by:

- providing policy advice to Ontario Colleges of Applied Arts and Technology (OCAATs) to assist them to develop innovative education programs to enable persons working in the licensed child-care sector to meet the education requirements needed for registration;
- providing further time for eligible applicants to complete an individualized learning plan if they do not fully meet the education requirements; and
- through collaboration with the Indigenous Advanced Education Skills Council, developing an integrated program approval process so that the college can more easily endorse early childhood education (ECE) programs in Indigenous post-secondary institutes.

The college has also leveraged its unique position as the only organization with provincial level data on the ECE workforce to provide regular reports and analysis to the Ministry of Education and local municipal service system managers. To sustain this important role, CECE is establishing a dedicated Data & Research Department.

Through its forward thinking, the college has demonstrated highly collaborative leadership along with complementary innovative public policy work to support a healthy registered ECE workforce.

Performance Measurement Framework

The OFC has adopted four interim performance indicators that now constitute its performance measurement framework. As our office has recently revamped its risk-informed compliance framework, and as we operationalize the recent FARPACTA and RHPA legislative amendments, we concluded that it would be prudent to retain these interim measures until the system stabilizes, subject to future review.

These four metrics, which are designed to assess whether the OFC is taking proactive steps to encourage regulators to improve their fair registration practices, are set out below:

- The annual reduction in the number of professions that the OFC places in its medium to high-risk compliance categories (20% reduction target annually).
- The number of best (commendable) practices that the OFC collects and disseminates to the professions on an annual basis (20 new best practices annually).
- The number of events and webinars that the OFC holds, and the publications that it issues on an annual basis.
- The percentage of regulators and other stakeholders that identify the OFC as an effective or highly effective regulator and service delivery agency (80% benchmark).

What follows is a brief assessment on how the OFC has fared against these assessment measures.

With respect to movement out of medium to high-risk category, in the 2023-24 risk cycle, the College of Physiotherapists of Ontario moved from the moderate to high risk to low-risk category, following, among other things, the successful development and administration of a new clinical examination. Thus, the 20% reduction target was achieved.

In January 2024, the OFC updated its *Legislated Obligations and Fair Registration Best Practices Guide for Regulated Professions and Compulsory Trades*, which now contains 94 registration best practices. The *Legislated Obligations and Fair Registration Best Practices Guide for Health Regulatory Colleges*, which was first published in November 2022, includes 56 best practices.

The OFC has also published several guidance documents respecting new FARPACTA legislative amendments, which contain information about best practices, including *Information and Advice to Regulators on Alternatives to Canadian Experience*. Finally, our office routinely includes discussions of best practices in our monthly *Newsletter* publications. Thus, the best practices target has also been achieved.

In 2022-23, The OFC completed 22 communications products or events, including monthly *Newsletter* distributions, the dissemination of guidance materials, the OFC's annual report and business plan, and webinars. In addition, the Fairness Commissioner spoke at nine regulator AGMs, council, or registration committee meetings, providing information on FARPACTA and RHPA amendments, an overview of the OFC's role and breakthrough registration practices.

Late in the reporting period, the OFC also initiated an innovative project to refresh its key performance indicators (KPIs). This initiative will feature the establishment of a regulator working group to seek input on how we measure and evaluate the impact of our work. We anticipate finalizing our new set of KPIs in the fall of 2024.

As the legislative and program landscape under which we work has now solidified, our office also plans to undertake a refreshed client satisfaction survey which will incorporate qualitative measurement of some, or all, of our new KPIs. Our 2022 client satisfaction survey indicated that 83% of regulator respondents rated the OFC as an effective regulator and service delivery agency, thus surpassing the 80% client satisfaction benchmark.

Appendix A

Risk-based Continuum Categories with Associated OFC Compliance Tools

Compliance Tools	Risk Category		
	Low	Moderately Low	Moderate to High
Meetings with regulators	Annual	Quarterly	Bi-Monthly
Provision of education and best practices	√	√	√
Completion and submission of Fair Registration Practices Reports	√	√	√
Completion of compliance action plan and other reports		√	√
Letter from Fairness Commissioner to the CEO / Registrar, Council and/or responsible minister		√	√
Publicizing non-compliance issues / opportunities for improvement in annual report or other publications		√	√
OFC initiated review of registration practices			√
Compliance assessment			√
Audit			√
Compliance order (for FARPACTA regulators)			√

Appendix B

Risk Factors Associated with Regulators in Elevated Risk Categories

Regulator and Risk Rating	Risk Factors identified	Some Issues to be Addressed in OFC Action Plan
Professional Engineers Ontario (PEO) – <i>medium to high risk</i>	<ul style="list-style-type: none"> • Impact of major changes to registration practices and relations with third-party service providers, including impact on application inventory. • Ability of the regulator to comply with newly introduced legislative and / or regulatory obligations. 	<ul style="list-style-type: none"> • Reduce inventory of legacy applications. • Evaluate the experience of internationally educated engineers with the CBA process.
College of Psychologists of Ontario (CPO) – <i>medium to high risk</i>	<ul style="list-style-type: none"> • Organizational capacity, which includes the pattern of appeals taken to the Health Profession Appeal and Review Board (HPARB). • The ability to promote inclusion including the historical under-representation of racialized members in the PhD registration class. • Addressing labour market shortages. 	<ul style="list-style-type: none"> • Consider opportunities to develop more flexible approaches to assess and register internationally trained psychologists. • Continue to systematically review the contents of HPARB decisions and the college's responses to them.
Ontario Association of Architects (OAA) – <i>moderate to high risk (moderate end of the category)</i>	<ul style="list-style-type: none"> • Ability of the regulator to comply with newly introduced legislative and / or regulatory obligations, related to implementing alternatives to the 	<ul style="list-style-type: none"> • Ensure that the OAA's CER alternative(s) comply with the applicable regulatory criteria and facilitate the timely registration of experienced architects

	<p>Canadian experience requirement.</p> <ul style="list-style-type: none"> • Impact of major changes to registration practices and relations with third-party service providers. 	<p>from international jurisdictions.</p> <ul style="list-style-type: none"> • Implement a thoughtful implementation plan to reinstate the licences of OAA's Lic.Tec. architectural technologists.
<p>Royal College of Dental Surgeons of Ontario (RCDSO) – <i>moderately low risk</i></p>	<ul style="list-style-type: none"> • Overall control that the regulator exerts over its assessment and registration processes and its relations with third-party service providers 	<ul style="list-style-type: none"> • Continue to work with the National Dental Examining Board (NDEB), fellow dental regulators and other stakeholders to further improve the fairness, timeliness, and accessibility of the assessment process for internationally trained dentists.
<p>College of Nurses of Ontario (CNO) – <i>moderately low risk</i></p>	<ul style="list-style-type: none"> • The impact of major changes to registration practices and relations with third-party service providers. • Addressing labour market shortages. 	<ul style="list-style-type: none"> • Continue to take steps to expedite the processing of applications in CNO's case inventory. • Continue to develop a client-focused plan to roll out the proposed new standardized training course for IEN applicants as well as other innovative proposals.
<p>College of Physicians and Surgeons of Ontario (CPSO) – <i>moderately low risk</i></p>	<ul style="list-style-type: none"> • The impact of major changes to registration practices and relations with third-party service providers. • Addressing labour market shortages. 	<ul style="list-style-type: none"> • Consider opportunities to further remove barriers for IMGs and accelerate assessment and registration processes for this cohort. • Work with the Canadian Association of Physician Assistants (CAPA) and

		<p>other stakeholders to implement fair assessment and registration processes for internationally trained physician assistants.</p>
<p>College of Optometrists of Ontario – <i>moderately low risk</i></p>	<ul style="list-style-type: none"> • The overall control that a regulator exerts over its assessment and registration processes, and its relations with third-party service providers. • Addressing labour market shortages. 	<ul style="list-style-type: none"> • Engage the Federation of Optometric Regulatory Authorities of Canada and the post-secondary sector to consider alternatives to the current requirement that most internationally trained optometrists complete both a five-month bridging program and the final two years of the Doctor of Optometry Program. • Discuss strategies with relevant stakeholders on ways to help ensure an adequate supply and distribution of optometrists in the province.

Appendix C

Financial Statements

Office of the Fairness Commissioner: Statement of Operations

Period from April 1, 2023, to March 31, 2024

Expenses:

Year Ended March 31, 2024

Ministry of Labour, Immigration, Training and Skills Development

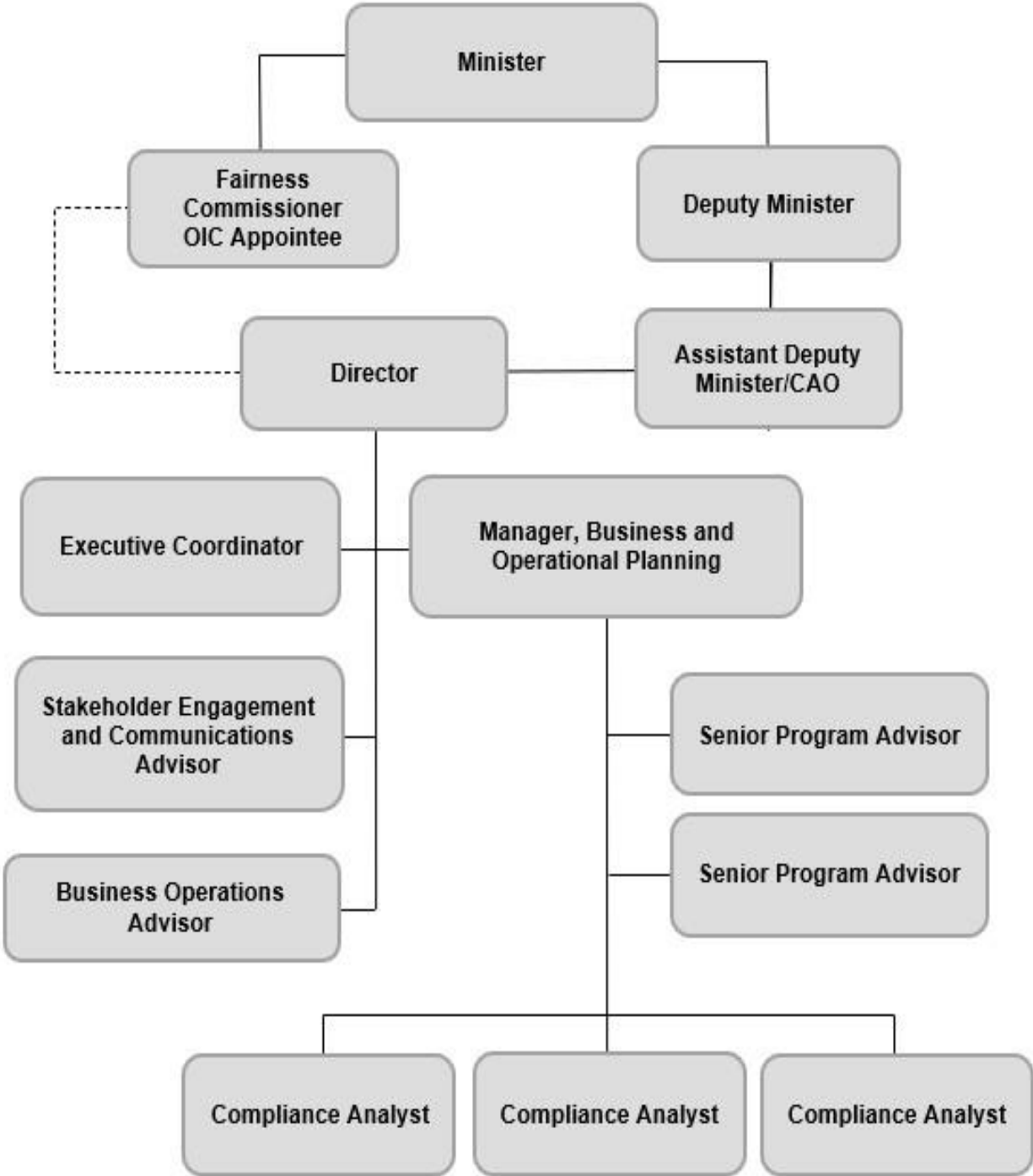
Standard Account Expenditure	Printed Estimates	In-Year Board Approvals	2022-2023 Budget	2023-24 Year-End Actuals
Salaries and Wages	\$ 800,300.00	\$ 520,600.00	\$ 1,320,900.00	\$ 1,157,906.67 *
Employee Benefits	\$ 119,500.00		\$ 119,500.00	\$ 147,833.84
Other Direct Operating Expenses (ODOE)	\$ 934,900.00		\$ 934,900.00	\$ 925,526.92
Total	\$ 1,854,700.00	\$ 520,600.00	\$ 2,375,300.00	\$ 2,231,312.43

* Please note that the salary and wages budget line reflects the recruitment and hiring practices of the office during the period and includes salary and benefit payments paid to the full-time Fairness Commissioner. For the period between April 1, 2023, to March 31, 2024, the Fairness Commissioner's total remuneration was \$206,640.

Appendix D

Organization Chart

Office of the Fairness Commissioner: Organizational Structure





FAIRNESS COMMISSIONER

COMMISSAIRE À L'ÉQUITÉ

**OFFICE OF THE FAIRNESS COMMISSIONER
BUREAU DU COMMISSAIRE À L'ÉQUITÉ**

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