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December 23, 2009



Office of the Fairness Commissioner  
1201 – 595 Bay Street  
Toronto, ON M7A 2B4

**CLIENT  
COPY**

Dear Madam:

We enclose herewith the audit report for the audit of registration practices for the College of Respiratory Therapists of Ontario for the period from April 2, 2008 to April 1, 2009.

If there are any questions in connection with the above, please contact the writer.

Yours very truly,  
CLARKE HENNING LLP

*VNR*

Vinay M. Raja, CA  
Partner  
[vraja@clarkehenning.com](mailto:vraja@clarkehenning.com)

*Enclosure*

Copy: Ms. Christine Robinson, Registrar

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For the College of Respiratory Therapists of Ontario

The Office of the Fairness Commissioner (OFC) requires the health regulatory colleges named in schedule 1 of the Regulated Health Professions Act, 1991 (RHPA) to undergo compliance audits to ensure that registration in Ontario is transparent, objective, impartial and fair. The Fairness Commissioner is required to specify the form and content of audit reports. In carrying out this function, the OFC has developed this reporting template to assist independent auditors in reporting on a health regulatory college's compliance with schedule 2 of the RHPA, the Health Professions Procedural Code (the Code).

The OFC will use the information provided in the audit reports to assess the registration practices of each health regulatory college on the basis of its obligations under the Code. If the OFC determines that a regulatory body regulates more than one profession, auditors will be notified that they must report on registration practices for each profession.

The health regulatory colleges received specifications about the scope and standards for the audit, guidance about the eligibility criteria for the roster of auditors, guidance on evaluation of registration practices and information about audit timelines in **Framework for Audits of Registration Practices: Guidance for Regulatory Bodies**. When conducting an audit, auditors should consider the following questions:

- Did you assess to what extent the health regulatory college's planning for registration practices complies with the Code? (Planning means policies that a regulatory body creates to formalize its procedures and practices.)
- Did you assess the effectiveness of the health regulatory college's registration practices in meeting the fair registration practices objectives set out in the Code?
- Did you assess the need for and relevance of the health regulatory college's registration requirements?
- Did you compare the registration practices carried out with those that were planned?
- If applicable, did you assess the effectiveness of any registration practices implemented to remedy shortcomings revealed by a previous audit?
- If applicable, did you assess the health regulatory college's compliance with the terms and conditions of a compliance order?
- Did you prepare a draft report on the audit and provide a copy to the health regulatory college for feedback?
- Did you consider any feedback and make appropriate changes?

As auditors fill out this audit report, these questions may be useful:

- Does the audit report state conclusions?
- Does the audit report explain factors that were considered in arriving at these conclusions?
- Does the audit report provide recommendations based on evidence identified during the audit?
- Does the audit report provide sufficient information to advise the OFC about the degree of compliance by the health regulatory college?
- Does the audit report provide sufficient information to support the audit conclusions and explain all exceptions?
- Does the audit report provide sufficient information to advise the OFC of potential complaints or problems?
- Does the audit report provide sufficient information to clarify and reinforce your judgment and decisions?

For the College of Respiratory Therapists of Ontario

## Completing the Audit Report

- The **auditor** completes sections A-F and H-J. The **health regulatory college** completes sections G and K.
- You must use Adobe Reader, version 9 or higher, to make all the functions in this form work.
- All sections of this audit report must be completed. Incomplete reports will be returned. The OFC will seek additional information from a health regulatory college if information in its audit report is unclear or incomplete.
- Do not use all uppercase or all lowercase print.
- Change the filename of your report to match the name that you choose from the drop-down menu at the top of the form.
- You can print the report at any stage by using Ctrl-P or the Print icon. To print blank copies of the testing procedures pages, go to **appendix A**.
- The hard copy of the audit report must be signed and dated in section H, Auditor's Certificate, by the lead practitioner responsible for conducting the audit, who must be a licensed public accountant. The name of the audit firm on the signature line of the hard copy is unacceptable.
- The same hard copy of the audit report must be signed and dated in section G, Health Regulatory College's Certificate, by the registrar or the CEO of the regulatory body.

## Submission and Publication Guidelines

- The audit report must be filed with the Fairness Commissioner using this reporting form.
- The auditor must submit the audit report by the deadline stated in the notice of audit sent to the health regulatory college. Reports submitted after the deadline will be marked "late."
- This form must be submitted by e-mail to [ofc@ontario.ca](mailto:ofc@ontario.ca). One hard copy with original signatures must also be filed by mail or courier to 595 Bay Street, Suite 1201, Toronto, ON M7A 2B4.
- **Written submissions** made by the health regulatory college on the draft audit report do not form part of this report but must be submitted to the OFC together with it.
- A copy of the audit report must be provided to the health regulatory college.
- The OFC encourages health regulatory colleges to make their audit reports publicly available. If they do so, they must publish each report in the same format and with the same content (but omitting section K if they choose) that was submitted to the OFC in this reporting template.

## Contact Us

- General or specific information is available during regular office hours:
  - 416.212.5661 Phone
  - 1.877.727.5365 Toll-free
  - 416.326.6080 TTY
  - [www.fairnesscommissioner.ca](http://www.fairnesscommissioner.ca)

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## SECTION A: General Information

**This section should be completed by the auditor.**

Health Regulatory College Name			
College of Respiratory Therapists of Ontario			
Period Covered by the Audit (e.g. July 16, 2008, through July 15, 2009)			
April 2, 2008		through April 1, 2009	
Notice of Audit Start Date	Notice of Audit Completion Date	Actual Start Date	Actual Completion Date
September 1, 2009	December 31, 2009	June 5, 2009	December 23, 2009

## SECTION B: Audit Approach

**This section should be completed by the auditor.**

The audit approach should outline your chosen methodology and fully describe the manner in which the methodology was framed. It should evidence planning for the audit, having regard for the particular objectives and scope of audit under consideration. It should also describe the manner in which you gathered information and evaluated the evidence obtained to assess compliance with the relevant sections of the RHPA. For instance, a description of the audit approach includes a list of the individuals you consulted during the course of the audit and an explanation of how you conducted your analysis and reached your conclusions.

Please describe fully your approach to the audit. Be sure to explain how you ensured that each sample is randomly selected and representative. For the purpose of this audit, "representative" means that the sample of items you chose, such as a sample of applications or a sample of decision letters, reflects the diversity of the applicants. For instance, a sample of applications could include applications from applicants trained in Ontario, applicants trained elsewhere in Canada, applicants trained in the United States and applicants trained abroad.

This box will expand as you type. Its size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

This audit was carried out pursuant to Canadian generally accepted auditing standards for Audits on Compliance with Agreements, Statutes and Regulations, as set out in section 5815 of CICA Handbook – Assurance. Specifically, the audit was designed to examine the registration practices of the College of Respiratory Therapists of Ontario (the "College") to assess its compliance with the standards set out in sections 15-22, 22.2-22.4, 22.6-22.7 and 22.9-22.11 inclusive of Schedule 2 – Health Professions Procedural Code of the Regulated Health Professions Act, 1991 (the "Code") during the year ended April 1, 2009 (the "audit period").

In the audit planning stage we met with the Registrar and registration staff to agree upon audit timing, audit approach and the cooperation and preparation that would be provided by the College. We requested and subsequently obtained from the College a document outlining how the College complied with each of the foregoing sections of the Code. In addition we reviewed the Respiratory Therapy Act, 1991, Regulation 596/94 as amended to date and the Study of Registration Practices of the College of Respiratory Therapists of Ontario, 2007 prepared by the Office of the

Fairness Commissioner (Ontario) (the "OFC"). All personnel involved with the audit were familiar with the Regulated Health Professions Act (in particular with the Code), with the Framework for Audits of Registration Practices published by the OFC and had attended one of the OFC auditor orientation sessions held in August, 2009.

The audit engagement was planned to provide a high, but not absolute, level of assurance by designing procedures such that the risk of an inappropriate conclusion is reduced to a low level. The procedures in this engagement involved inspection of the College's registration records and files, inquiry in interviews with College staff and confirmation obtained from third parties, as follows:

- (a) We examined the College's Fair Registration Practices Report for 2008, the Council minutes and Registration Committee minutes during the audit period, the College's website, agreements with third parties, policy documentation, training records and, on a test basis, registration files for applicants who applied for registration (or inquired about registration) during the audit period. In the latter case the files were selected from a listing of all applicants and care was taken that at least one-half of those files selected were educated outside Ontario (and weighted toward those educated outside of Canada and the United States).
- (b) We inquired regarding registration procedures, problems and experiences in interviews with the Registrar and with all staff involved in the registration process.
- (c) We confirmed, in confidential telephone interviews with a sample of all applicants, whether the College's registration procedures were, in their opinion, transparent, objective, impartial and fair and further, whether the college complied with the specific code requirements that would be within the cognizance of the interviewee. Once again care was taken that at least one-half of those selected were educated outside Ontario (and weighted toward those educated outside of Canada and the United States). We also confirmed with the OFC that information that was within their cognizance.

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## SECTION C: Evaluation of Registration Practices

**This section should be completed by the auditor.**

The Schedule 2 of the RHPA, the Health Professions Procedural Code (the Code), includes requirements for health regulatory colleges with respect to registration practices. The following questions relate to your evaluation of the registration practices specified in the Code.

Please use your answers to these questions to show how you evaluated these practices. Ensure that your answers address the scope, methodology and rationale behind any sample sizes chosen. Ensure also that you provide an explanation for any limitations to provide absolute assurance. The evaluation record should be sufficiently complete and detailed to provide a person who has no previous connection to the audit with an understanding of the work performed and the basis of the decisions taken.

These questions are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices. Where the legislative terms used are open to interpretation (e.g., "reasonable," "objective," "fair," etc.), you must use your professional judgment in determining if the legislative requirements have been met.

For each question in this section, you will describe the health regulatory college's process and report your testing procedures. Use the checklist to indicate which procedures you performed for each question. Then scroll down to pages where you will describe each test individually (or state why you did not do any tests).

Each page for reporting your testing procedures has Instruction buttons to remind you of the required information for the following categories:

- **Result of the test:** The outcome of the testing procedure performed above. The result would typically include the number of exceptions, if any, and an explanation for each exception.
- **Conclusion:** An assessment of the health regulatory college's compliance for this question.
- **Recommendation:** Ways in which the health regulatory college can improve upon the registration practice covered by this question.

If you want to print the testing procedure pages to work with before you key in your answers, you will find blank generic versions of these pages in [appendix A](#).

Some specific terms in the questions are hyperlinked to a list of explanations in [appendix B](#).

For the College of Respiratory Therapists of Ontario

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## SECTION C: Evaluation of Registration Practices

### Table of Questions

#### C1: Information for Applicants

- C1a. Does the health regulatory college provide information about its registration practices to persons applying or intending to apply for registration?
- C1b. Does the health regulatory college provide information about the amount of time that the registration process usually takes?
- C1c. Does the health regulatory college communicate the objective requirements for registration?
- C1d. Does the health regulatory college explain which requirements may be satisfied through acceptable alternatives?
- C1e. Does the health regulatory college provide a fee scale?
- C1f. Type your additional question(s) here.
- C1g. Additional comments on section C1

#### C2: Timely Decisions, Responses and Reasons

- C2a. Does the health regulatory college make registration decisions within a reasonable time?
- C2b. Does the health regulatory college give written responses to applicants within a reasonable time?
- C2c. Does the health regulatory college give written reasons to applicants within a reasonable time about all registration decisions and internal review or appeal decisions?
- C2d. Type your additional question(s) here.
- C2e. Additional comments on section C2

#### C3: Internal Review or Appeal

- C3a. Does the health regulatory college provide an internal review or appeal from its registration decisions within a reasonable time?
- C3b. Does the health regulatory college give applicants for registration the opportunity to make oral, written or electronic submissions about any internal review or appeal?
- C3c. Type your additional question(s) here.
- C3d. Additional comments on section C3

#### C4: Information on Appeal Rights

- C4a. Does the health regulatory college inform applicants of any rights they may have to request a further review of, or appeal from, a registration decision?
- C4b. Are decision-makers in internal reviews or appeals different from those who made the original registration decision?
- C4c. Type your additional question(s) here.
- C4d. Additional comments on section C4

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## SECTION C: Evaluation of Registration Practices

### C5: Documentation of Qualifications

- C5a. Does the health regulatory college make available to the public its requirements for the documentation of qualifications that must accompany an application?
- C5b. Does the health regulatory college give applicants information on acceptable alternatives to the documentation if they cannot obtain the standard documentation for reasons beyond their control?
- C5c. Type your additional question(s) here.
- C5d. Additional comments on section C5

### C6: Assessment of Qualifications

- C6a. Does the health regulatory college make its own assessment of qualifications in a way that is transparent, objective, impartial and fair?
- C6b. If the health regulatory college relies upon third parties to assess qualifications, does it take reasonable measures to ensure that the third parties make assessments of qualifications in a way that is transparent, objective, impartial and fair?
- C6c. Type your additional question(s) here.
- C6d. Additional comments on section C6

### C7: Training

- C7a. Does the health regulatory college ensure that persons assessing qualifications and making registration decisions are trained?
- C7b. Does the health regulatory college ensure that persons who make internal review or appeal decisions know how to hold hearings, if hearings are necessary?
- C7c. Does the health regulatory college ensure that training in any special considerations that may apply in the assessment of applications is provided, and that the process for applying those considerations is taught?
- C7d. Type your additional question(s) here.
- C7e. Additional comments on section C7

### C8: Access to Records

- C8a. Does the health regulatory college give applicants access to records related to their application, upon written request?
- C8b. Does the health regulatory college limit access, beyond the limitations permitted in the legislation?
- C8c. Does the health regulatory college give the applicant partial access when records can reasonably be severed?
- C8d. Does the health regulatory college have a process for considering requests for access to records?
- C8e. Does the health regulatory college give applicants an estimate of any fee charged for access?
- C8f. Is the amount of the health regulatory college's fee for access to records less than the amount prescribed by its regulation, if applicable?
- C8g. Does the health regulatory college waive access fees?
- C8h. Type your additional question(s) here.
- C8i. Additional comments on section C8



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At any time, you may click a letter in the range above to go to a different section, or click

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### C1: Information for Applicants

**C1a. Does the health regulatory college provide information about its registration practices to persons applying or intending to apply for registration?**

☒ Yes ☐ No

Describe the health regulatory college's process for providing information about its registration practices. This information is made available on the College's web-site. The College also provides hard copies of the information by contacting them or arranging a personal meeting. The information includes registration fact sheets, application guide and checklist, and application form.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

☒ Sampling

☒ Document review

☐ Interviews

☐ Other procedures

☐ I did not use any testing procedures

For the College of Respiratory Therapists of Ontario

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

**C1a. Does the health regulatory college provide information about its registration practices to persons applying or intending to apply for registration?**

**Sample of** Telephone interview with a sample of applicants during the audit period - see section B for more detail.  
(e.g., international applications)

Population size	Sample size	% of Population
258	10	3.9

The OFC asks for sample sizes only for information purposes, in order to gain a better understanding of the testing procedure. Sample sizes add transparency to the audit report and will allow the OFC to improve the audit process, if necessary, in the future.

Describe the rationale for your sample.

Professional judgment to obtain a sample large and varied enough to test compliance.

**Result of the test** Instruction

Interviewees confirmed that information regarding registration practices was readily available.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another sampling procedure

For the College of Respiratory Therapists of Ontario

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

**C1a. Does the health regulatory college provide information about its registration practices to persons applying or intending to apply for registration?**

Describe your document review procedure.  
Reviewed website, including application forms.

**Result of the test** Instruction

Confirmed that the necessary information is readily available.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

For the College of Respiratory Therapists of Ontario

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### C1: Information for Applicants

**C1b. Does the health regulatory college provide information about the amount of time that the registration process usually takes?**

☒ Yes ☐ No

Describe the health regulatory college's process for providing information about the amount of time that the registration process usually takes.

The College determined the amount of time that an application will be processed that would be reasonable for an applicant and for the internal process of the College, without sacrificing the safety of the public. After determining this time line, the College publishes this information on its website.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☒ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

**C1b. Does the health regulatory college provide information about the amount of time that the registration process usually takes?**

**Sample of** Telephone interview with a sample of applicants during the audit period - see section B for more detail.  
(e.g., international applications)

Population size	Sample size	% of Population
258	10	3.9

The OFC asks for sample sizes only for information purposes, in order to gain a better understanding of the testing procedure. Sample sizes add transparency to the audit report and will allow the OFC to improve the audit process, if necessary, in the future.

Describe the rationale for your sample.

Professional judgment to obtain a sample large and varied enough to test compliance.

**Result of the test** Instruction

Interviewees confirmed that information regarding timelines was readily available.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another sampling procedure

For the College of Respiratory Therapists of Ontario

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

**C1b. Does the health regulatory college provide information about the amount of time that the registration process usually takes?**

Describe your document review procedure.  
Reviewed the website.

**Result of the test** Instruction

The required information is readily available.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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### C1: Information for Applicants

#### C1c. Does the health regulatory college communicate the objective requirements for registration?

☒ Yes ☐ No

Describe the health regulatory college's process for communicating the objective requirements for registration. Requirements for both Canadian trained and internationally trained applicants are clearly set out on the web-site.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☒ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

#### C1c. Does the health regulatory college communicate the objective requirements for registration?

**Sample of** Telephone interview with a sample of applicants during the audit period - see section B for more detail.  
(e.g., international applications)

Population size	Sample size	% of Population
258	10	3.9

The OFC asks for sample sizes only for information purposes, in order to gain a better understanding of the testing procedure. Sample sizes add transparency to the audit report and will allow the OFC to improve the audit process, if necessary, in the future.

Describe the rationale for your sample.

Professional judgment to obtain a sample large and varied enough to test compliance.

#### Result of the test Instruction

Interviewees confirmed that information regarding the objective requirements for registration was readily available.

#### Conclusion Instruction

The College complies with this provision of the Code.

#### Recommendation Instruction

None.

Add another sampling procedure



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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

#### C1c. Does the health regulatory college communicate the objective requirements for registration?

Describe your document review procedure.

Reviewed the web-site and application form.

#### Result of the test Instruction

The required information is readily available.

#### Conclusion Instruction

The College complies with this provision of the Code.

#### Recommendation Instruction

None.

Add another document review procedure

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### C1: Information for Applicants

**C1d. Does the health regulatory college explain which requirements may be satisfied through acceptable alternatives?**

☒ Yes ☐ No

Describe the health regulatory college's process for explaining which requirements may be satisfied through acceptable alternatives.

The Prior Learning Assessment process is an option available to individuals who have not completed an accredited respiratory therapy program (or an equivalent non-Canadian program) or cannot obtain educational documents, to demonstrate their prior learning and competence. There are several options available to applicants to demonstrate language proficiency. These alternatives are outlined on the College's website.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

**C1d. Does the health regulatory college explain which requirements may be satisfied through acceptable alternatives?**

Describe your document review procedure.  
Reviewed the College's websote.

**Result of the test** Instruction

Confirmed the information set out above.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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### C1: Information for Applicants

#### C1e. Does the health regulatory college provide a fee scale?

☒ Yes ☐ No

Describe the health regulatory college's process for providing a fee scale.  
The College has established a fee scale and publishes it on its website.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C1: Information for Applicants

#### C1e. Does the health regulatory college provide a fee scale?

Describe your document review procedure.  
Reviewed the website.

**Result of the test** Instruction

Confirmed the required information was provided.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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Questions C1a-C1e are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to information for applicants, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C1: Information for Applicants

**C1f. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C1: Information for Applicants

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#### C1g. Additional comments on section C1, Information for Applicants

None.

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### C2: Timely Decisions, Responses and Reasons

#### C2a. Does the health regulatory college make registration decisions within a reasonable time?

☒ Yes ☐ No

Describe the health regulatory college's process for making registration decisions within a reasonable time.

The College's web-site outlines reasonable stated timelines. The registration staff are careful to adhere to these timelines.

Does the health regulatory college have a stated timeline for making registration decisions?

☒ Yes ☐ No

Timeline as stated by the health regulatory college

The stated time line for decisions to be made is 2 to 4 weeks.

Source of timeline (e.g., policy, regulation)

Policy set out on the web-site

Process for ensuring adherence to timeline

The staff take due care to ensures that each file is flowing through the process.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

☒ Sampling

☐ Document review

☒ Interviews

☐ Other procedures

☐ I did not use any testing procedures



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### C2: Timely Decisions, Responses and Reasons

#### C2a. Does the health regulatory college make registration decisions within a reasonable time?

**Sample of** Telephone interview with a sample of applicants during the audit period - see section B for more detail.  
(e.g., international applications)

Population size	Sample size	% of Population
258	10	3.9

The OFC asks for sample sizes only for information purposes, in order to gain a better understanding of the testing procedure. Sample sizes add transparency to the audit report and will allow the OFC to improve the audit process, if necessary, in the future.

Describe the rationale for your sample.

Professional judgment to obtain a sample large and varied enough to test compliance.

**Result of the test** Instruction

Interviewees confirmed that information regarding registration decisions were made within a reasonable time.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another sampling procedure

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### C2: Timely Decisions, Responses and Reasons

#### C2a. Does the health regulatory college make registration decisions within a reasonable time?

**Sample of** Examination of a sample of applicant files during the audit period - see section B for more detail.  
(e.g., international applications)

Population size	Sample size	% of Population
258	15	5.8

The OFC asks for sample sizes only for information purposes, in order to gain a better understanding of the testing procedure. Sample sizes add transparency to the audit report and will allow the OFC to improve the audit process, if necessary, in the future.

Describe the rationale for your sample.

Professional judgment to obtain a sample large and varied enough to test compliance.

**Result of the test** Instruction

Confirmed adherence to the published timelines.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None

Add another sampling procedure

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### C2: Timely Decisions, Responses and Reasons

#### C2a. Does the health regulatory college make registration decisions within a reasonable time?

Interviews of Registration Co-Ordinator

(e.g., registration committee members)

Describe your interview procedure.

Inquiry.

#### Result of the test Instruction

Staff demonstrates in-depth knowledge of the registration process. A fair, open and objective attitude is demonstrated by their willingness to assist applicants through the process and to ensure that the College is meeting its own timelines.

#### Conclusion Instruction

The College complies with this provision of the Code.

#### Recommendation Instruction

None.

Add another interview procedure

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### C2: Timely Decisions, Responses and Reasons

**C2b. Does the health regulatory college give written responses to applicants within a reasonable time?**

☒ Yes ☐ No

Describe the health regulatory college's process for giving written responses to applicants within a reasonable time.  
Once a decision is made, a template letter is used to draft the response to the applicant.

Does the health regulatory college have a stated timeline for giving written responses to applicants?

☒ Yes ☐ No

Source of timeline (e.g., policy, regulation)

Policy disclosed on website.

Process for ensuring adherence to timeline

The College staff take due care.

Timeline as stated by the health regulatory college

The time line is 2 to 4 weeks.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

☐ Sampling

☐ Document review

☐ Interviews

☒ Other procedures

☐ I did not use any testing procedures

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### C2: Timely Decisions, Responses and Reasons

#### C2b. Does the health regulatory college give written responses to applicants within a reasonable time?

Describe your other testing procedure.

Verification of adherence with this timeline was included in the audit tests (sampling and interview) outlined at 2a.

#### Result of the test Instruction

Confirmed adherence to the published timelines.

#### Conclusion Instruction

The College complies with this provision of the Code.

#### Recommendation Instruction

None.

Add another testing procedure

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### C2: Timely Decisions, Responses and Reasons

**C2c. Does the health regulatory college give written reasons to applicants within a reasonable time about all registration decisions and internal review or appeal decisions?**

☒ Yes ☐ No

Describe the health regulatory college's process for giving written reasons to applicants within a reasonable time. Once a decision is made, a template letter is used to draft the response to the applicant.

Does the health regulatory college have a stated timeline for giving written reasons to applicants?

☒ Yes ☐ No

Timeline as stated by the health regulatory college

The time line is 2 to 4 weeks.

Source of timeline (e.g., policy, regulation)

Policy as set out in website

Process for ensuring adherence to timeline

Same as C2a.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

☐ Sampling

☐ Document review

☐ Interviews

☒ Other procedures

☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C2: Timely Decisions, Responses and Reasons

**C2c. Does the health regulatory college give written reasons to applicants within a reasonable time about all registration decisions and internal review or appeal decisions?**

Describe your other testing procedure.

Verification of adherence with this timeline was included in the audit tests (sampling and interview) outlined at 2a.

**Result of the test** Instruction

Applicants are advised of registration decisions and Registration Committee decisions within the published timelines.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another testing procedure

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Questions C2a-C2c are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to timely decisions, responses and reasons, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C2: Timely Decisions, Responses and Reasons

**C2d. Type your additional question here.**

None.

Describe the health regulatory college's process for acting within a reasonable time about the question you raised.

Does the health regulatory college have a stated timeline for acting within a reasonable time about the question you raised?

☐ Yes ☐ No

Timeline as stated by the health regulatory college

Source of timeline (e.g., policy, regulation)

Process for ensuring adherence to timeline

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures



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### C2: Timely Decisions, Responses and Reasons

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#### C2e. Additional comments on section C2, Timely Decisions, Responses and Reasons

None.

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### C3: Internal Review or Appeal

**C3a. Does the health regulatory college provide an internal review or appeal from its registration decisions within a reasonable time?**

☒ Yes ☐ No

Describe the health regulatory college's process for providing an internal review or appeal from its registration decisions within a reasonable time.

The Registration Committee meets on a regular basis to ensure that applications can be processed in a reasonable time.

Timeline as stated by the health regulatory college

Eight weeks maximum.

Source of timeline (e.g., policy, regulation)

The Registration Committee meets on a regular basis.

Process for ensuring adherence to timeline

Pre-agreed meeting dates for the Registration Committee.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C3: Internal Review or Appeal

**C3a. Does the health regulatory college provide an internal review or appeal from its registration decisions within a reasonable time?**

Describe your other testing procedure.

Verification of adherence with this timeline was included in the audit tests (sampling and interview) outlined at C2a.

**Result of the test** Instruction

Confirmed adherence with the published guidelines.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another testing procedure

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### C3: Internal Review or Appeal

**C3b. Does the health regulatory college give applicants for registration the opportunity to make oral, written or electronic submissions about any internal review or appeal?**

☒ Yes ☐ No

Describe the health regulatory college's process for giving applicants for registration the opportunity to make oral, written or electronic submissions about any internal review or appeal.

The College provides the information through its letter of decision that the applicant has 30 days to make a written submission to the Registration Committee.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C3: Internal Review or Appeal

**C3b. Does the health regulatory college give applicants for registration the opportunity to make oral, written or electronic submissions about any internal review or appeal?**

Describe your document review procedure.

Reviewed the College's template letter and actual letters sent to applicants.

**Result of the test** Instruction

The College notifies the applicant of their right to make a submission to the Registration Committee.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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Questions C3a-C3b are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to internal review or appeal, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C3: Internal Review or Appeal

**C3c. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C3: Internal Review or Appeal

#### C3d. Additional comments on section C3, Internal Review or Appeal

None.

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### C4: Information on Appeal Rights

**C4a. Does the health regulatory college inform applicants of any rights they may have to request a further review of, or appeal from, a registration decision?**

☒ Yes ☐ No

Describe the health regulatory college's process for informing applicants of any rights they may have to request a further review of, or appeal from, a registration decision.

The College informs applicants that they have a right to a further appeal with the Health Professions Appeal and Review Board, through the Registration Committee decision letter sent to the applicant.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures



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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C4: Information on Appeal Rights

**C4a. Does the health regulatory college inform applicants of any rights they may have to request a further review of, or appeal from, a registration decision?**

Describe your document review procedure.

Reviewed the College's template letter and actual letters sent to applicants.

**Result of the test** Instruction

The College informs the applicant of their right to an appeal.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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### C4: Information on Appeal Rights

**C4b. Are decision-makers in internal reviews or appeals different from those who made the original registration decision?**

☒ Yes ☐ No

Describe the health regulatory college's process for selecting decision-makers in original registration decisions and in internal reviews or appeals from those decisions.

The Registrar and the College's registration staff make the original registration decisions. The Registration Committee (including any panel thereof) is set up in accordance with the Code and is comprised of persons different from the College staff.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C4: Information on Appeal Rights

#### C4b. Are decision-makers in internal reviews or appeals different from those who made the original registration decision?

Describe your document review procedure.

Reviewed the Registration Committee minutes and reviewed the list of Registration Committee members to ensure that it did not include College staff. .

#### Result of the test Instruction

Confirmed the information provided above. Registration staff usually attend Registration Committee meetings as resource persons, but do not participate in decision-making discussions.

#### Conclusion Instruction

The College complies with this provision of the Code..

#### Recommendation Instruction

None.

Add another document review procedure

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## SECTION C: Evaluation of Registration Practices

Questions C4a-C4b are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to information on appeal rights, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C4: Information on Appeal Rights

**C4c. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C4: Information on Appeal Rights

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#### C4d. Additional comments on section C4, Information on Appeal Rights

None.

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### C5: Documentation of Qualifications

**C5a. Does the health regulatory college make available to the public its requirements for the documentation of qualifications that must accompany an application?**

☒ Yes ☐ No

Describe the health regulatory college's process for making available to the public its requirements for the documentation of qualifications that must accompany an application.

This information is made available on the College's website. The College also provides information over the telephone, by e-mail, by fax and in person at the office.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures

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### C5: Documentation of Qualifications

**C5a. Does the health regulatory college make available to the public its requirements for the documentation of qualifications that must accompany an application?**

Describe your other testing procedure.

Verification of this disclosure was included in the audit tests (sampling and document examination) outlined at C1a.

**Result of the test** Instruction

Confirmed the information provided above.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another testing procedure

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### C5: Documentation of Qualifications

**C5b. Does the health regulatory college give applicants information on acceptable alternatives to the documentation if they cannot obtain the standard documentation for reasons beyond their control?**

☒ Yes ☐ No

Describe the health regulatory college's process for giving applicants information on acceptable alternatives to the documentation if they cannot obtain the standard documentation for reasons beyond their control.

In exceptional circumstances, when it is not possible for the applicant to obtain the required documentation, the Registrar may refer the applicant to the College's Prior Learning Assessment upon receipt of a signed affidavit. The College considers exceptional circumstances to be when war or the political climate have prevented the institution from operating or when applicants fear persecution if they apply for the original documents themselves. The foregoing policy is set out in the last paragraph of RG-Transcript-411 which was posted on the College's website during the audit period.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures



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### C5: Documentation of Qualifications

**C5b. Does the health regulatory college give applicants information on acceptable alternatives to the documentation if they cannot obtain the standard documentation for reasons beyond their control?**

Describe your document review procedure.

Reviewed RG-Transcript-411 on the College's website.

**Result of the test** Instruction

Alternative documentation policy is outlined.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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Questions C5a-C5b are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to documentation of qualifications, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C5: Documentation of Qualifications

**C5c. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C5: Documentation of Qualifications

#### C5d. Additional comments on section C5, Documentation of Qualifications

None.

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### C6: Assessment of Qualifications

**C6a. Does the health regulatory college make its own assessment of qualifications in a way that is transparent, objective, impartial and fair?**

☒ Yes    ☐ No    ☐ N/A, it relies on a third party to assess qualifications

Describe the health regulatory college's process for making assessments of qualifications.

The College uses third party, World Education Services ("WES"), to assess the university degrees of internationally educated applicants, uses the Michener Institute to carry out Prior Learning Assessments and uses the Canadian Board for Respiratory Care to prepare and administer the qualifying examination. All other requirements are assessed by the College.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C6: Assessment of Qualifications

**C6a. Does the health regulatory college make its own assessment of qualifications in a way that is transparent, objective, impartial and fair?**

Describe your other testing procedure.

Our audit included a combination of sampling, document examination, interviews and confirmation from third parties to examine all aspects of the College's registration process. In the course of carrying out all of these procedures we considered whether the College assessed qualifications transparently, objectively, impartially and fairly.

#### Result of the test Instruction

There was no indication that the College did not assess qualifications in a transparent, objective, impartial and fair manner and in compliance with the existing Regulation 596/94.

#### Conclusion Instruction

With respect to this test, there was no indication that the College's qualification assessment practices were not transparent, objective, impartial and fair.

#### Recommendation Instruction

None.

Add another testing procedure

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### C6: Assessment of Qualifications

**C6b. If the health regulatory college relies upon third parties to assess qualifications, does it take reasonable measures (e.g., a formal service agreement or regular monitoring) to ensure that the third parties make assessments of qualifications in a way that is transparent, objective, impartial and fair?**

☒ Yes ☐ No ☐ N/A

Describe the health regulatory college's process for taking reasonable measures to ensure that its third parties make assessments of qualifications in a way that is transparent, objective, impartial and fair.

The College has a written contract with WES to assess international academic credentials as to authenticity and to assess the comparability of degrees. The College regularly communicates with WES and monitors its work to ensure that it is carried out in a transparent, objective, impartial and fair manner.

Similarly the College has a written contract with The Michener Institute and Algonquin College to conduct Prior Learning Assessments for applicants. The College monitors their work to ensure that it is carried out in a transparent, objective, impartial and fair manner.

The College has a written contract with the Canadian Board for Respiratory Care ("CBRC") for the preparation and administration of the qualifying examination. It participates with CBRC in establishing the body of knowledge that the examination is testing and monitors the service provided to ensure that it is carried out in a transparent, objective, impartial and fair manner.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☒ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C6: Assessment of Qualifications

**C6b. If the health regulatory college relies upon third parties to assess qualifications, does it take reasonable measures (e.g., a formal service agreement or regular monitoring) to ensure that the third parties make assessments of qualifications in a way that is transparent, objective, impartial and fair?**

Describe your document review procedure.

Reviewed the agreement between the College and the Canadian Board for Respiratory Care to carry out the service of the national exam, as well as agreements with the Michener Institute, Algonquin College and WES.

**Result of the test** Instruction

Confirmed the existence of and provisions of the agreements.

**Conclusion** Instruction

With respect to this test, there was no indication that the College's qualification assessment practices were not transparent, objective, impartial and fair.

**Recommendation** Instruction

None.

Add another document review procedure

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### C6: Assessment of Qualifications

**C6b. If the health regulatory college relies upon third parties to assess qualifications, does it take reasonable measures (e.g., a formal service agreement or regular monitoring) to ensure that the third parties make assessments of qualifications in a way that is transparent, objective, impartial and fair?**

Interviews of Registration staff

(e.g., registration committee members)

Describe your interview procedure.

Inquiry.

**Result of the test** Instruction

Confirmed the information provided above.

**Conclusion** Instruction

With respect to this test, there was no indication that the College's qualification assessment practices were not transparent, objective, impartial and fair.

**Recommendation** Instruction

None.

Add another interview procedure



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Questions C6a-C6b are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to assessment of qualifications, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C6: Assessment of Qualifications

**C6c. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C6: Assessment of Qualifications

#### C6d. Additional comments on section C6, Assessment of Qualifications

None.

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### C7: Training

**C7a. Does the health regulatory college ensure that persons assessing qualifications and making registration decisions are trained?**

☒ Yes ☐ No

Describe the health regulatory college's process for ensuring that persons assessing qualifications and making registration decisions are trained.

The College maintains training for its registration staff and registration committee. There is an orientation for the Registration Committee. The Registration staff are required to have up-to-date knowledge of the registration process and attend training classes.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☒ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C7: Training

**C7a. Does the health regulatory college ensure that persons assessing qualifications and making registration decisions are trained?**

Describe your document review procedure.

Reviewed the details of the Registration Committee orientation and training sessions as outlined in Registration Committee minutes. Also reviewed documentation of topics and attendance at registration staff training sessions.

**Result of the test** Instruction

Training is provided.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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### C7: Training

**C7a. Does the health regulatory college ensure that persons assessing qualifications and making registration decisions are trained?**

Interviews of Registration staff

(e.g., registration committee members)

Describe your interview procedure.

Inquiry

**Result of the test** Instruction

Confirmed that all staff registration members had attended training.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another interview procedure

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### C7: Training

**C7b. Does the health regulatory college ensure that persons who make internal review or appeal decisions know how to hold hearings, if hearings are necessary?**

☐ Yes ☐ No ☒ N/A, no hearings are necessary

Describe the health regulatory college's process for ensuring that persons who make internal review or appeal decisions know how to hold hearings, if hearings are necessary.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C7: Training

**C7c. Does the health regulatory college ensure that training in any special considerations that may apply in the assessment of applications is provided, and that the process for applying those considerations is taught?**

☒ Yes ☐ No

Describe the health regulatory college's process for ensuring that training in any special considerations that may apply in the assessment of applications is provided, and that the process for applying those considerations is taught. The College's staff training and Registration Committee orientation ensure that staff and committee members are aware of the statutory need to consider and, if appropriate, apply special considerations in the assessment of applications and that the process for applying such considerations would depend on the circumstances. (To date there has been no perceived need for or request for such special considerations.)

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☒ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C7: Training

**C7c. Does the health regulatory college ensure that training in any special considerations that may apply in the assessment of applications is provided, and that the process for applying those considerations is taught?**

Interviews of Registration staff

(e.g., registration committee members)

Describe your interview procedure.

Inquiry.

**Result of the test** Instruction

Confirmed the information provided above.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another interview procedure



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Questions C7a-C7c are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to training, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C7: Training

**C7d. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C7: Training

#### C7e. Additional comments on section C7, Training

None.

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### C8: Access to Records

**C8a. Does the health regulatory college give applicants access to records related to their application, upon written request?**

☒ Yes ☐ No

Describe the health regulatory college's process for giving applicants access to records related to their application, upon written request.

The College has a formal written policy to process applicant requests for access to their registration files within the limits set out in the Code (although no such request has ever been made).

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C8: Access to Records

**C8a. Does the health regulatory college give applicants access to records related to their application, upon written request?**

Describe your document review procedure.

Reviewed the College's policies.

**Result of the test** Instruction

No issues noted. The applicant can contact the College to request personal information from the file.

**Conclusion** Instruction

The College complies with this provision of the Code.

**Recommendation** Instruction

None.

Add another document review procedure

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### C8: Access to Records

**C8b. Does the health regulatory college limit access, beyond the limitations permitted in the legislation?**

☐ Yes ☒ No

Describe the health regulatory college's process for limiting access.

See C8a.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☒ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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## SECTION C: Evaluation of Registration Practices

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C8: Access to Records

#### C8b. Does the health regulatory college limit access, beyond the limitations permitted in the legislation?

Describe your document review procedure.  
Reviewed the College's policies.

#### Result of the test Instruction

The policy is quite clear that the applicant is entitled to a copy of all his or her registration records except those that would, in the opinion of the Registrar, jeopardize the safety of any person.

#### Conclusion Instruction

The College complies with this provision of the Code.

#### Recommendation Instruction

None.

Add another document review procedure

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### C8: Access to Records

**C8c. Does the health regulatory college give the applicant partial access when records can reasonably be severed?**

☐ Yes    ☐ No    ☒ N/A, full access is always provided

Describe the health regulatory college's process for giving applicants partial access when records can reasonably be severed.

See C8a.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C8: Access to Records

**C8d. Does the health regulatory college have a process for considering requests for access to records?**

☒ Yes ☐ No

Describe the health regulatory college's process for considering requests for access to records.

See C8a.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures



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## SECTION C: Evaluation of Registration Practices

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### C8: Access to Records

#### C8d. Does the health regulatory college have a process for considering requests for access to records?

Describe your other testing procedure.

Verification was included in the audit test (document examination) outlined at C8a.

#### Result of the test Instruction

Verified that the College had a process for considering such requests.

#### Conclusion Instruction

The College complies with this provision of the Code.

#### Recommendation Instruction

None.

Add another testing procedure

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### C8: Access to Records

**C8e. Does the health regulatory college give applicants an estimate of any fee charged for access?**

☐ Yes      ☐ No      ☒ N/A, no access fee is charged

Describe the health regulatory college's process for giving applicants an estimate of any fee charged for access.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C8: Access to Records

**C8f. Is the amount of the health regulatory college's fee for access to records less than the amount prescribed by its regulation, if applicable?**

☐ Yes    ☐ No    ☐ N/A, there is no regulation prescribing an amount    ☒ N/A, no access fee is charged

**If there is no regulation prescribing an amount, but an amount is charged for access to records, does the amount reflect reasonable cost recovery?**

☐ Yes    ☐ No

Describe the health regulatory college's process for establishing the amount of the access fee.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C8: Access to Records

#### C8g. Does the health regulatory college waive access fees?

☐ Yes ☐ No ☒ N/A, no access fee is charged

If yes, are these waivers based on fair and equitable reasons?

☐ Yes ☐ No

Describe the health regulatory college's process for waiving access fees.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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## SECTION C: Evaluation of Registration Practices

Questions C8a-C8g are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to access to records, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

### C8: Access to Records

**C8h. Type your additional question here.**

None.

Describe the health regulatory college's process for the question you raised.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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### C8: Access to Records

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#### C8i. Additional comments on section C8, Access to Records

None.

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## SECTION D: Evaluation of Registration Practices, General Duty

**This section should be completed by the auditor.**

In addition to the specific requirements set out in schedule 2 of the RHPA, the Health Professions Procedural Code (the Code), the Code also contains a general duty for health regulatory colleges to have registration practices that are transparent, objective impartial and fair. In evaluating whether the health regulatory college is complying with the general duty, the auditor must examine whether *all* its registration practices are transparent, objective, impartial and fair, not just those referred to in section C of this form. The questions in section D can assist auditors in evaluating registration practices for compliance with the general duty.

Please use your answers to these questions to show how you evaluated these practices. Ensure that your answers address the scope, methodology and rationale behind any sample sizes chosen. Ensure also that you provide an explanation for any limitations to provide absolute assurance. The evaluation record should be sufficiently complete and detailed to provide a person who has no previous connection to the audit with an understanding of the work performed and the basis of the decisions taken.

These questions are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices. Where the legislative terms used are open to interpretation (e.g., "reasonable," "objective," "fair," etc.), you must use your professional judgment in determining if the legislative requirements have been met.

For each question in this section, you will describe the health regulatory college's process and report your testing procedures. Use the checklist to indicate which procedures you performed for each question. Then scroll down to pages where you will describe each test individually (or state why you did not do any tests).

Each page for reporting your testing procedures has **Instruction** buttons to remind you of the required information for the following categories:

- **Result of the test:** The outcome of the testing procedure performed above. The result would typically include the number of exceptions, if any, and an explanation for each exception.
- **Conclusion:** An assessment of the health regulatory college's compliance for this question.
- **Recommendation:** Ways in which the health regulatory college can improve upon the registration practice covered by this question.

If you want to print the testing procedure pages to work with before you key in your answers, you will find blank generic versions of these pages in [appendix A](#).

Some specific terms in the questions are hyperlinked to a list of explanations in [appendix B](#).

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- D1. [Does the health regulatory college have practices that relate to its registration function but are not listed in the Code?](#)
- D2. [Does the health regulatory college have any requirements for applicants that are not used in the registration process to make registration decisions?](#)
- D3. [Can the health regulatory college's registration process be streamlined?](#)
- D4. [Does the health regulatory college have a clear rationale for each non-exemptible registration requirement?](#)
- D5. [Does the health regulatory college have a clear rationale for each exemptible registration requirement?](#)
- D6. [Type your additional question\(s\) here.](#)
- D7. [Additional comments on section D](#)

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## SECTION D: Evaluation of Registration Practices, General Duty

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### D1. Does the health regulatory college have practices that relate to its registration function but are not listed in the Code?

☐ Yes ☒ No

List, one at a time, the practices of the health regulatory college that are related to the registration function but are not listed in the Code. After you have recorded one practice in the space below, use the Testing procedures checklist to list all the evaluation methods you used to assess this practice. After you have reported the tests for this practice, you will be able to list another practice.

1.

None.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this practice. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures



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## SECTION D: Evaluation of Registration Practices, General Duty

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To describe another testing procedure of the same type for this practice, click on the button at the bottom of the page. To move on to the next procedure for this practice, scroll down.

### D1. Does the health regulatory college have practices that relate to its registration function but are not listed in the Code?

Testing procedure for None.

Describe your other testing procedure.

Our audit included a combination of sampling, document examination, interviews and confirmation from third parties to examine all aspects of the College's registration process. In the course of carrying out all of these procedures we considered whether the College had any practices in the registration function that were not listed in the Code.

#### Result of the test **Instruction**

We did not encounter any practices in the registration function that were not listed in the Code.

#### Conclusion **Instruction**

With respect to this test, there was no indication that the College's registration practices were not transparent, objective, impartial and fair.

#### Recommendation **Instruction**

None.

Add another practice

Add another testing procedure

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**D2. Does the health regulatory college have requirements for applicants that are not used in the registration process to make registration decisions?**

☐ Yes ☒ No

List the requirements for applicants that are not used in the registration process to make registration decisions.

Number	Requirement
1.	None.
<div> Delete last requirement Add another requirement </div>	

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to determine that the health regulatory college has requirements for applicants that are not used in the registration process to make registration decisions. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling  
☐ Document review  
☐ Interviews  
☒ Other procedures  
☐ I did not use any testing procedures

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## SECTION D: Evaluation of Registration Practices, General Duty

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### D2. Does the health regulatory college have requirements for applicants that are not used in the registration process to make registration decisions?

Describe your other testing procedure.

Our audit included a combination of sampling, document examination, interviews and confirmation from third parties to examine all aspects of the College's registration process. In the course of carrying out all of these procedures we considered whether the College had any requirements for applicants that are not used in the registration process.

#### Result of the test Instruction

We did not encounter any requirements for applicants that are not used in the registration process during the audit period.

#### Conclusion Instruction

There was no indication that the College had requirements that were not used in the registration process.

#### Recommendation Instruction

None.

Add another testing procedure

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### D3. Can the health regulatory college's registration process be streamlined?

☒ Yes ☐ No

Describe how the registration process could be more efficient.

While in theory the process can always be streamlined, the College's existing registration process is already streamlined within the parameters of what is practical and reasonable.

Typical length of the registration process from initial application through to registration.

1 week(s) to 4 week(s)

Typical length of the registration process once the applicant fulfills all the requirements.

1 week(s) to 2 week(s)

Describe each stage of the registration process, including typical length.

Stage	Typical length			
Complete application received.	0	day(s)	to	0 day(s)
Assess that documentation is complete and requirements met -- applicant is advised	1	week(s)	to	3 week(s)
Requirements not met, applicant is advised of referral to Registration Committee	1	week(s)	to	3 week(s)
Applicant has 30 days to submit additional documentation (unless waived)	0	day(s)	to	1 month(s)
File sent to Registration Committee, committee meets & considers application	0.5	month(s)	to	2.5 month(s)

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**SECTION D: Evaluation of Registration Practices, General Duty**

**D3. Can the health regulatory college's registration process be streamlined?**

Registration Committee decides -- applicant is advised	1	week(s)	to	2	week(s)
				Delete last stage	Add another stage

**Testing procedures**

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### D3. Can the health regulatory college's registration process be streamlined?

Describe your other testing procedure.

Our audit included a combination of sampling, document examination, interviews and confirmation from third parties to examine all aspects of the College's registration process. In the course of carrying out all of these procedures we considered whether there was any reasonable way in which the College's registration practices could be streamlined.

#### Result of the test Instruction

The College complies with the timelines as stated in the policy.

#### Conclusion Instruction

In our opinion, the College handled its registration practices in an efficient manner during the audit period.

#### Recommendation Instruction

None.

Add another testing procedure

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### D4. Does the health regulatory college have a clear rationale for all exemptible registration requirements?

☒ Yes ☐ No

Describe the health regulatory college's process for determining which registration requirements are exemptible and for communicating the rationale for exemptibility to applicants.

All registration requirements, exemptible and non-exemptible, were originally drafted by the College and forwarded to the Health Professions Regulatory Policy and Programs Branch of the Ontario Ministry of Health and Long-term Care (the Branch). This branch reviewed the validity of each of the requirements prior to them being passed into law in the form of a Regulation approved by the Ontario government. Any subsequent revision to the requirements was processed in the same manner.

The rationale for the original requirements and for any subsequent revisions, together with an outline of the process followed by the College (consultations with the various stakeholders), are forwarded to the Branch at that time. Other factors entering into the requirements (for example a list of areas of competence to be tested in qualifying examinations or criteria for assessments of performance during practical training) are maintained, reviewed and updated on a regular basis (together with the rationale any changes).

All of the requirements are set following consultation with numerous parties and stakeholders to protect the public and ensure that the College is licencing only competent, properly trained practitioners. Information regarding the rationale for any requirement is available to applicants upon inquiry.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☒ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### D4. Does the health regulatory college have a clear rationale for all exemptible registration requirements?

Interviews of Registrar and registration staff

(e.g., registration committee members)

Describe your interview procedure.

Inquiry.

**Result of the test** Instruction

Discussed requirements together with review and updating procedures.

**Conclusion** Instruction

With respect to this test, there was no indication that the College's registration practices were not transparent, objective, impartial and fair.

**Recommendation** Instruction

None.

Add another interview procedure



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### D5. Does the health regulatory college have a clear rationale for all non-exemptible registration requirements?

☒ Yes ☐ No

Describe the health regulatory college's process for determining which registration requirements are non-exemptible and for communicating the rationale for non-exemptibility to applicants.

All registration requirements, exemptible and non-exemptible, were originally drafted by the College and forwarded to the Health Professions Regulatory Policy and Programs Branch of the Ontario Ministry of Health and Long-term Care (the Branch). This branch reviewed the validity of each of the requirements prior to them being passed into law in the form of a Regulation approved by the Ontario government.

The rationale for the original requirements and for any subsequent revisions, together with an outline of the process followed by the College (consultations with the various stakeholders), are forwarded to the Branch at that time. Other factors entering into the requirements (for example a list of areas of competence to be tested in qualifying examinations or criteria for assessments of performance during practical training) are maintained, reviewed and updated on a regular basis (together with the rationale any changes).

All of the requirements are set following consultation with numerous parties and stakeholders to protect the public and ensure that the College is licencing only competent, properly trained practitioners. Information regarding the rationale for any requirement is available to applicants upon inquiry.

### Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☒ Interviews
- ☐ Other procedures
- ☐ I did not use any testing procedures

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To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

### D5. Does the health regulatory college have a clear rationale for all non-exemptible registration requirements?

Interviews of Registrar and registration staff

(e.g., registration committee members)

Describe your interview procedure.

Inquiry.

**Result of the test** Instruction

Discussed requirements together with review and updating procedures.

**Conclusion** Instruction

With respect to this test, there was no indication that the College's registration practices were not transparent, objective, impartial and fair.

**Recommendation** Instruction

None.

Add another interview procedure

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## SECTION D: Evaluation of Registration Practices, General Duty

Questions D1-D5 are not comprehensive or prescriptive, and auditors retain complete discretion to determine the nature of the inspection and to use generally accepted accounting principles and generally accepted assurance standards to develop suitable criteria for evaluating registration practices.

If in your professional judgment, the above questions did not allow you to audit all aspects of the registration practice related to the general duty, you may type below, one at a time, the additional questions that you developed. After you have reported the tests for this question, you will be able to list another question. When you have no additional questions, scroll down to continue your report.

**D6. Type your additional question here.**

**Does the College's Registration Committee apply exemptions to the registration requirements in a rational and consistent manner?**

Describe the health regulatory college's process for the question you raised.

The Registration Committee ensures that members receive the necessary training to apply exemptions to the registration requirements in a rational and consistent manner.

## Testing procedures

Click one or more boxes in the checklist below to list all the evaluation methods you used to assess this question. When you have chosen all the methods that apply, scroll down to describe each test you performed (or to explain why you did not use any tests).

- ☐ Sampling
- ☐ Document review
- ☐ Interviews
- ☒ Other procedures
- ☐ I did not use any testing procedures

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**SECTION D: Evaluation of Registration Practices, General Duty**

All rows expand as you type. Their size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

To describe another testing procedure of the same type for this question, click on the button at the bottom of the page. To move on to the next procedure for this question, scroll down.

**D6. Does the College's Registration Committee apply exemptions to the registration requirements in a rational and consistent manner?**

Describe your other testing procedure.

Our audit included a combination of sampling, document examination, interviews and confirmation from third parties to examine all aspects of the College's registration process. In the course of carrying out all of these procedures we considered whether the Registration Committee applied exemptions in a rational and consistent manner.

**Result of the test** Instruction

There was no indication that the College's Registration Committee did not apply exemptions in a rational and consistent manner and within the confines of the existing legislation and Regulation 596/94.

**Conclusion** Instruction

With respect to this test, there was no indication that the College's registration practices were not transparent, objective, impartial and fair.

**Recommendation** Instruction

None.

Add another questionAdd another testing procedure

For the College of Respiratory Therapists of Ontario

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## SECTION D: Evaluation of Registration Practices, General Duty

All rows expand as you type. Their size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

At any time, you may click a letter in the range above to go to a different section, or click

[Back to the Table of Questions](#) at the top of the page to go to a different question in this section.

### D7. Additional comments on section D, General Duty

None.

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## SECTION E: Reports

**This section should be completed by the auditor.**

Under each of the following questions, explain how you verified whether the organization was compliant with schedule 2 of the RHPA, the Health Professions Procedural Code (the Code). For example: Did you ask the registrar a question? Did you review a website to determine if a required report was available? Did you question the Fairness Commissioner's staff to find out if the report was submitted by the deadline?

All rows expand as you type. Their size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

### E1: Reports under Section 22.6 of the Code

#### E1a. Has the health regulatory college undertaken a review of registration practices?

☒ Yes    ☐ No

Explain your verification method:

In discussion with College staff involved in the registration process, we determined that the College is continually reviewing various aspects of its registration practices. However no comprehensive review similar to that envisioned by the pamphlet Conducting Entry-to-Practice Reviews: Guide for Regulators of Ontario Professions published by the OFC was either required or undertaken during the audit period.

#### E1b. Has it done so at a time specified by the Fairness Commissioner?

☐ Yes    ☐ No    ☒ N/A, no review was undertaken

Explain your verification method:

Confirmed with Office of the Fairness Commissioner that no review under section 22.6 of the Code was specified during the audit period.

#### E1c. Did the review include the proper analysis (necessary and relevant, efficient and timely, reasonable fees)?

☐ Yes    ☐ No    ☒ N/A, no review was undertaken

Explain your verification method:

For the College of Respiratory Therapists of Ontario

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## SECTION E: Reports

**This section should be completed by the auditor.**

Under each of the following questions, explain how you verified whether the organization was compliant with schedule 2 of the RHPA, the Health Professions Procedural Code (the Code). For example: Did you ask the registrar a question? Did you review a website to determine if a required report was available? Did you question the Fairness Commissioner's staff to find out if the report was submitted by the deadline?

All rows expand as you type. Their size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

### E2: Reports under Section 22.7 of the Code

**E2a. Has the health regulatory college prepared and filed its Fair Registration Practices Report this year?**

☒ Yes      ☐ No

Explain your verification method:

Filing of the report was confirmed by the Office of the Fairness Commissioner.

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## SECTION E: Reports

**This section should be completed by the auditor.**

Under each of the following questions, explain how you verified whether the organization was compliant with schedule 2 of the RHPA, the Health Professions Procedural Code (the Code). For example: Did you ask the registrar a question? Did you review a website to determine if a required report was available? Did you question the Fairness Commissioner's staff to find out if the report was submitted by the deadline?

All rows expand as you type. Their size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

### E3: Filing of Reports under Section 22.9 of the Code

**E3a.** Has the Fair Registration Practices Report been submitted by the date the Fairness Commissioner specified?

☒ Yes      ☐ No      ☐ N/A, no reports were required

Explain your verification method:

Date of submission confirmed by the Office of the Fairness Commissioner.

### E4: Form of Reports under Section 22.10 of the Code

**E4a.** Did all reports and certificates required take the form and contain the information the Fairness Commissioner specified?

☒ Yes      ☐ No      ☐ N/A, no reports were required

Explain your verification method:

We examined the report, including the certificate, and, on a test basis, compared the form and the information contained therein with the form and content specified in the Guidelines for Fair Registration Practices Reports published by the OFC.

### E5: Certification of Reports under Section 22.11 of the Code

**E5a.** Did the report provided under section 22.7 include a statement certifying that all the information required to be provided in the report was provided and is accurate?

☒ Yes      ☐ No      ☐ N/A, no reports were required

Explain your verification method:

The Office of the Fairness Commissioner confirmed that the certification "was done electronically and no issues were identified in this process".



For the College of Respiratory Therapists of Ontario

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## SECTION F: Assessment of Compliance

**This section should be completed by the auditor.**

Complete the table below according to the results of the tests you have conducted during your audit.

Specific terms are hyperlinked to a list of explanations in [appendix B](#).

Findings	Number of instances of non-compliance	Number of instances of material error	Number of control deficiencies identified
Information for applicants	0	0	0
Timely decisions, responses and reasons	1	0	0
Internal review or appeal	0	0	0
Information on appeal rights	0	0	0
<u>Documentation of qualifications</u>	0	0	0
<u>Assessment of qualifications</u>	0	0	0
<u>Training</u>	0	0	0
Access to records	0	0	0
<u>General duty</u> : Transparent, objective, impartial and fair registration practices	0	0	0

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## SECTION F: Assessment of Compliance

Use your professional judgment to provide an independent assessment of the health regulatory college's compliance with schedule 2 of the RHPA, the Health Professions Procedural Code (the Code). You should rate the health regulatory college's degree of compliance for each specific requirement in the Code and for the general duty in the Act to have registration practices that are transparent, objective, impartial and fair. The rating conclusions reached must be based on the results from the audit procedures performed.

The possible ratings range from "good" to "unsatisfactory" as defined below.

- **Good:** The controls were properly designed and have been operating effectively. No recommendations or very minor recommendations are included, and the criteria required by the Code were met.
- **Satisfactory:** The controls were properly designed and have been operating effectively, but there is room for improvement and the criteria required by the Code were met for the most part.
- **Needs Improvement:** There was a significant weakness in the control design and/or operating effectiveness, and the criteria required by the Code were partially met.
- **Unsatisfactory:** There was a serious weakness in the control design and/or operating effectiveness, the criteria required by the Code were not met, and remedial action is warranted.

Auditors must provide a justification or explanation for why each rating was chosen. Your justification should be based on your conclusion for each of the specific requirements and the general duty.

Rows expand as you type. Their size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

Specific terms are hyperlinked to a list of explanations in [appendix B](#).

Principal elements	Rating	Justification
Information for applicants	Good	College complies with the Code in all respects.
Timely decisions, responses and reasons	Good	College complies with the Code in all respects.
Internal review or appeal	Good	College complies with the Code in all respects.
Information on appeal rights	Good	College complies with the Code in all respects.
<b><u>Documentation of qualifications</u></b>	Good	College complies with the Code in all respects.
<b><u>Assessment of qualifications</u></b>	Good	College complies with the Code in all respects.
<b><u>Training</u></b>	Good	College complies with the Code in all respects.
Access to records	Good	College complies with the Code in all respects.
<b><u>General duty:</u></b> Transparent, objective, impartial and fair registration practices	Good	College complies with the Code in all respects.

For the College of Respiratory Therapists of Ontario

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**Section G: Health Regulatory College's Certificate**

**This section should be completed by the regulatory body.** The registrar or the CEO of the regulatory body should sign the certificate in the hard copy of the audit report. No signature is required in the digital report.

Specific terms are hyperlinked to a list of explanations in [appendix B](#).

The health regulatory college certifies that it:

- read, understood and followed the information provided in [Framework for Audits of Registration Practices: Guidance for Ontario's Regulatory Bodies](#);
- ensured that its auditor is a licensed public accountant in good standing for the duration of the audit;
- cooperated with the auditor;
- provided any assistance to the auditor that was reasonably necessary;
- furnished information to the auditor regarding its registration practices and its compliance with the legislation; and
- was provided with a draft copy of the audit report and provided any [written submissions](#) to the auditor within 30 days of receipt of that draft.

I am authorized to sign on behalf of the organization.

Name (Last name, First name)

Robinson, Christine

Title

Registrar

Signature



Date

December 23, 2009

For the College of Respiratory Therapists of Ontario

Go to Section:



**Section H: Auditor's Certificate**

**This section should be completed by the auditor.** The hard copy of the audit report must be signed by the lead practitioner responsible for conducting the audit. The name of the audit firm on the signature line is unacceptable in the hard copy. No signature is required in the digital report.

Specific terms are hyperlinked to a list of explanations in [appendix B](#).

I Vinaykumar M. Raja certify that:  
(name)

- I am a licensed public accountant in good standing with a governing body that meets the standards of the Public Accountants Council for the Province of Ontario;
- I do not have any actual or potential conflict of interest that would prevent me from conducting an audit of registration practices of
- I conducted the audit in accordance with the Regulated Health Professions Act, 1991 and the regulations (if any);
- a draft report on the audit was prepared and a copy of it provided to the health regulatory college, together with a notice that the body had 30 days to make submissions on the draft;
- copies of any **written submissions** made by the health regulatory college on the draft audit report are being submitted to the OFC together with this form;
- the information contained in this audit report is accurate;
- all information required to be provided in the audit report is included;
- a copy of this audit report has been provided to the health regulatory college;
- no **personal information** is included in the audit report; and
- I have not retained any **personal information** I collected directly or indirectly for the purpose of this audit.

Signature

*Vinaykumar M. Raja*

Date

December 23, 2009



For the College of Respiratory Therapists of Ontario

Go to Section:



## Section J: Auditor's Opinion

**This section should be completed by the auditor.**

The auditor's opinion is the overall conclusion of the auditor on the compliance of the health regulatory college with the RHPA. The auditor's opinion must indicate that your audit was conducted in accordance with the Canadian generally accepted auditing standards section 5815 and that your audit covered all the sections included in "The Scope of Audits for Health Regulatory Colleges," on pages 5-6 of **Framework for Audits of Registration Practices: Guidance for Ontario's Regulatory Bodies**. The opinion must also clearly indicate the period covered by your audit.

The box will expand as you type. Its size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

To the Fairness Commissioner for the Province of Ontario:

and

TO THE COUNCIL OF THE COLLEGE OF RESPIRATORY THERAPISTS OF ONTARIO

We have audited the registration practices of the College of Respiratory Therapists of Ontario (the "College") to assess the College's compliance with the standards set out in sections 15-22, 22.2-22.4, 22.6-22.7 and 22.9-22.11 inclusive of Schedule 2 – Health Professions Procedural Code ("the Code") of the Regulated Health Professions Act, 1991 during the year ended April 1, 2009. Compliance with the standards set out in the above-noted sections of the Code is the responsibility of the management of the College. Our responsibility is to express an opinion on this compliance based on our audit.

We conducted our audit in accordance with Canadian generally accepted auditing standards. Those standards require that we plan and perform an audit to obtain reasonable assurance whether the College complied with the standards set out in the above-noted sections of the Code. Such an audit includes examining, on a test basis, evidence supporting compliance and evaluating the overall compliance with these criteria. The foregoing pages outline the College's procedures and controls together with our tests, results and comments.

In our opinion, during the year ended April 1, 2009 the College of Respiratory Therapists of Ontario was in compliance, in all material respects, with the standards set out in the above-noted sections of the Code.

*Clarke Henning LLP*

CHARTERED ACCOUNTANTS  
Licensed Public Accountants

For the College of Respiratory Therapists of Ontario

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**Section J: Auditor's Opinion**

Name of Auditor Vinaykumar M. Raja	Title Licensed Public Accountant	Designation of Auditor (CA, CGA, CMA) CA
Name of Audit Firm Clarke Henning LLP		
City Toronto	Province Ontario	Date December 23, 2009

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## Section K: Health Regulatory College's Response

**This section should be completed by the regulatory body.**

Indicate your response to the auditor's recommendations. This response usually includes an action plan to remedy the problem(s) identified by the auditor or to address the auditor's suggestion(s) for improvement, and a deadline to implement the action plan. You must include this section in your submission to the OFC, but you may omit it from the report you publish if you choose.

This box will expand as you type. Its size is unlimited. If you reach the end of the page, another page will appear to allow for additional comments.

Re: D4 - Does the health regulatory college have a clear rationale for all exemptible registration requirements?

The College does its best to ensure that exemptible registration requirements are applied in a consistent manner. Data is retained regarding decisions and policies are then formulated based on this information. For example, the policy on the requirements applicants must meet, or restrictions that may be imposed on certificates of registration for applicants who do not meet the currency requirements; a policy on re-issuing Graduate Certificates of Registration.

Re: E1 - Has the health regulatory college undertaken a review of registration practices?

The CRTO has chosen to focus its internal review on the area of Prior Learning Assessment and bridging programs.

The CRTO has had a Prior Learning Assessment process in plan for over a decade. However, based on recent research and lessons learned, the CRTO recognizes the need to improve the process that recognizes previous learning of internationally trained RTs and IEHPs, and make additional educational resources available.

In order to address this, the CRTO has embarked on a Gap Analysis project, funded through the Ministry of Citizenship and Immigration and in partnership with Colleges Integrating Immigrants to Employment (CIITE), the Michener Institute, Algonquin College, Fanshawe College and La Cité Collégiale. The project includes:

- a gap analysis to determine which skills and knowledge need to be covered in the bridge program;
- establishing eligibility criteria to determine participation in the bridge training;
- researching other best practices and lessons learned to determine the most fair and efficient structure of the bridging program;
- development of a model for an RT bridging program that meets the learning needs of IEHPs and IERTs, can be feasibly delivered at Ontario community colleges, is efficient in terms of the duration of the program and will provide the opportunity for learners to access financial supports to enable them to afford this learning opportunity;
- development of a detailed plan to pilot the model in the second year of the project.

The implementation of a bridging program for IERTs and IEHPs will benefit internationally educated immigrants by more effectively assisting this cohort to become registered RTs in Ontario in a more timely and efficient manner. This will benefit Ontario by better utilizing the skills and knowledge of our IEHPs and IERTs and meeting the labour market needs for RTs in various geographic locations in Ontario.



For the College of Respiratory Therapists of Ontario

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## Section K: Health Regulatory College's Response

In addition, the CRTO will be conducting a situational analysis of issues related to integrating internationally educated health professionals into the profession of Respiratory Therapy in Ontario.

Finally, amendments to the Registration Regulated are being considered in order to accommodate applicants educated outside of Canada.

## APPENDIX A: Testing Procedures

This is a generic version of the sampling procedure page in sections C and D. You may print and copy this page for making notes, but do not include it in your final submission to the OFC.

Question:

Sample of \_\_\_\_\_

(e.g., international applications)

Population size	Sample size	% of Population

The OFC asks for sample sizes only for information purposes, in order to gain a better understanding of the testing procedure. Sample sizes add transparency to the audit report and will allow the OFC to improve the audit process, if necessary, in the future.

Describe the rationale for your sample.

Result of the test

Conclusion

Recommendation

## APPENDIX A: Testing Procedures

This is a generic version of the document review procedure page in sections C and D. You may print and copy this page for making notes, but do not include it in your final submission to the OFC.

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Question:

Describe your document review procedure.

Result of the test

Conclusion

Recommendation

## APPENDIX A: Testing Procedures

This is a generic version of the interview procedure page in sections C and D. You may print and copy this page for making notes, but do not include it in your final submission to the OFC.

Question:

Interviews of \_\_\_\_\_

(e.g., registration committee members)

Describe your interview procedure.

Result of the test

Conclusion

Recommendation

## APPENDIX A: Testing Procedures

This is a generic version of the page for reporting other procedures (not sampling, document review, or interviews) in sections C and D. You may print and copy this page for making notes, but do not include it in your final submission to the OFC.

Question:

Describe your other testing procedure.

Result of the test

Conclusion

Recommendation

## APPENDIX A: Testing Procedures

This is a generic version of the page for reporting no tests in sections C and D. You may print and copy this page for making notes, but do not include it in your final submission to the OFC.

Question:

I did not use any testing procedures because

**Conclusion**

**Recommendation**

## APPENDIX B: Hyperlinked Terms

<b>Acceptable alternatives</b>	Documentation that is acceptable to the regulatory body in lieu of the usual or official documentation required of applicants in most cases. Alternatives may be accepted in cases where an applicant cannot obtain the usual or official documentation due to a number of reasons, such as conflict in the applicant's home country. These options may include acceptance of signed undertakings; notarized declarations or sworn affidavits detailing the applicant's education and experience; references from former instructors, colleagues or supervisors; challenge exams; prior learning assessments; or registration committee interviews.
<b>Assessment of qualifications</b>	The evaluation process conducted by the regulatory body or by a third party used by the regulator in order to determine whether an individual seeking registration has the required qualifications (i.e., necessary knowledge, skills and abilities) to practise the profession.
<b>Documentation of qualifications</b>	The proof that must be submitted by applicants in order to demonstrate that they have the required qualifications to practise the profession. Often this is done by submitting documentation from academic institutions, examiners, workplace or clinical experience, etc.
<b>Exemptible registration requirement</b>	A registration requirement that may be waived by the regulatory body under certain circumstances.
<b>General duty</b>	In evaluating whether the health regulatory college is complying with the general duty, the auditor must examine whether all its registration practices, and not just those specified in the Code, are transparent, objective, impartial and fair.
<b>Non-exemptible registration requirement</b>	A registration requirement that cannot be waived.
<b>Personal information</b>	Personal information has the same meaning as in the Freedom of Information and Protection of Privacy Act: recorded information about an identifiable individual. Auditors must not place any individual's name in the body of the audit report. Any views or opinions expressed should be attributed to the health regulatory college only and not to any particular employee.
<b>Reasonable time</b>	What is "reasonable" will be determined by auditors during the conduct of an audit.
<b>Requirements</b>	Requirements for registration include the qualifications applicants must have, the proof they must provide to show they are met, the fees they must pay and any other criteria they must meet to be registered. Qualifications typically include academic credentials, language proficiency, workplace or clinical experience, successful completion of registration exams and good character. Some requirements appear in the profession's governing statute and regulations. Other requirements are set by the regulator in its bylaws and in its formal and informal policies.
<b>Streamlined</b>	A process made shorter, simpler or more efficient in any way, e.g., by removing steps in the process, improving workflow, avoiding duplication of procedures, etc.
<b>Training</b>	Instruction given by a regulatory body to individuals assessing qualifications and making registration decisions or internal review or appeal decisions. It includes, where appropriate, guidance on how to hold hearings and on any special considerations that may apply in the assessment of applications and the process for applying those considerations. The training provided by regulatory bodies may also include information regarding anti-discriminatory policies in place and how to achieve impartiality throughout the registration process.
<b>Written submission</b>	For the purpose of the health regulatory college's certificate, a written submission means any formal written communication provided by the health regulatory college to the auditor that pertains to the draft audit report.