

Fair Registration Practices Report 2020

The Fair Registration Practices Report was created as required in the:

- Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) s.20 and 23(1), for the regulated professions named in Schedule 1 of FARPACTA
- Health Professions Procedural Code set out in Schedule 2 of the Health Professions Act, 1991 (RHPA) s. 22.7(1) and 22.9(1), for health colleges

Guidelines for this report are available to download as a .pdf on the OFC website. <u>https://www.fairnesscommissioner.com/en/Publications/Pages/Guidelines.aspx</u>

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Qualitative Information

The following qualitative information is collected for the purpose of highlighting a regulator's enhancements to improve fair access year over year, including actions that result from recommendations made in the OFC's Assessment of Registration Practices.

For each of the categories below, where applicable, please describe any improvements/changes implemented in the last year by your organization or a third-party for the purpose of changing fair access.

Please also describe the impact of these improvements/changes on applicants. If you have been working on improvements/changes over the last year that have not yet been implemented, describe your progress and the expected impact the improvements/changes will have on applicants and your organization.

Provide as much detail as possible. This can include the rationale for the improvements/changes, relevant findings from preliminary work leading up to the improvements/changes, methodology, relevant dates and anything else you think is important.

Include as much supporting material as possible to support your description (e.g., relevant reports, policies, protocols, websites, other documents and anything else you think is important). This material can be provided in the form of hyperlinks to electronic sources.

a. Requirements for registration, including acceptable alternatives

i) Describe any improvements / changes implemented in the last year

On March 23, 2020, CRTO's Council passed the approved revision to the <u>Emergency Registration</u> <u>policy</u>. The Emergency Registration policy allowed the CRTO to expedite the registration process during emergencies or health crises such as COVID-19 by eliminating barriers to registration. The Emergency Registration policy allowed applicants to be registered without having met certain exemptible registration requirements (e.g., currency requirements, and registration related fees) at the Registrar's discretion if they meet certain conditions detailed in the policy.

When the allowable discretion is exercised pursuant to the Emergency Registration policy to register an applicant, the Registrar references the <u>Currency policy</u> as a guideline for applying applicable, terms, conditions, or limitations on the member's certificate.

ii) Describe the impact of the improvements / changes on applicants

Under the Emergency Registration policy, registration considerations are applied to specific groups of applicants e.g., retired, resigned members, inactive members, and respiratory therapy students.

• Retired or Resigned Members:

Members who have retired and/or resigned their certificate of registration with the CRTO can reapply by submitting an online application for registration at <u>www.crto.on.ca</u>. At the time of reapplying, applicants who had practiced respiratory therapy within the last two (2) years are considered to have met the currency requirements under section 55(5) of the Ontario Regulation 596/94, PART VIII (Registration). The Emergency Registration policy allows the Registrar to re-issue the same class of certificate held prior to retiring/resigning, along with any applicable terms, conditions, or limitations the member previously held.

Applicants who had not practiced within the last two to five (2–5) years will be registered with terms, conditions, or limitations in accordance with the Registration Currency policy.

Applicants who have a currency gap of more than five (5) years will be referred to the Registration Committee for consideration.

• Inactive Class of Registration:

Members in the inactive class applying for a General certificate and who have practiced respiratory therapy within the last two years are considered to have met the currency requirements under Section 55(5) of the Ontario Regulation 596/94. The Registrar will issue the certificate along with any applicable terms, conditions, or limitations the Member previously held prior to going Inactive.

Applicants who have not practiced within the last two to five (2–5) years, the Registration Committee grants the Registrar the authority to register the individual and apply terms, conditions, or limitations on the certificate of registration in accordance with the Registration Currency policy.

Applicants who have a currency gap of more than five (5) years will be referred to the Registration Committee for consideration.

• Respiratory Therapy Students:

Respiratory therapy students enrolled in a CRTO recognized program who are within ten weeks of successful completion of the program may be considered for registration in the Graduate class. This is contingent on confirmation from the educational program that the applicant has completed the program. In addition, during the state of emergency, individuals will be considered eligible to write the CBRC exam as a first-time writer.



• Out of Province Applicants

There are no changes to out of province applicants, applicants from other provinces will continue to be registered in accordance with the <u>Labour Mobility: Applicants from Regulated</u> <u>Canadian Jurisdictions Policy</u> and the <u>Registration Currency Policy</u>.

Describe the impact of the improvements / changes on your organization

The intent of the Emergency Registration policy is to expedite the registration process by eliminating barriers to registration. In terms of impact to the organization, there are no significant impacts beyond an increase in registration. Under the policy, the CRTO have registered nearly 200 additional Respiratory Therapists, mostly from final year students with the remainder from Respiratory Therapists who were recently retired or in the Inactive class of registration. This added nearly five percent to the CRTO's registration numbers, which was a critical buffer when the CRTO was planning for surge capacity in the early stages of the pandemic.

Assessment of qualifications

i) Describe any improvements/changes implemented in the last year

No changes last year.

ii) Describe the impact of the improvements/changes on applicantsNo changes last year.

iii) Describe the impact of the improvements/changes on your organizationNo changes last year.

b. Provision of timely decisions, responses, and reasons

Describe any improvements/changes implemented in the last year
 No changes last year.

ii) Describe the impact of the improvements/changes on applicantsNo changes last year.

iii) Describe the impact of the improvements/changes on your organizationNo changes last year.



c. Fees

i) Describe any improvements/changes implemented in the last year

Between March and December 2020, the \$75 application fee was waived for applicants under the Emergency Registration policy. The rationale to waive the application fee was to reduce barriers to registration, allowing applicants to apply for registration without added financial stressor. In addition to waiving application fees, registration fees for successful applicants under the policy were deferred for up to six (6) months. Applicants are not required to submit their registration fees to be registered until after the 6 months grace period.

ii) Describe the impact of the improvements/changes on applicants

The waiver on application and the 6-month deferral of registration fees removed potential financial barriers towards registration so applicants can more readily enter the profession to assist with the pandemic.

iii) Describe the impact of the improvements/changes on your organization

Despite the waiver of application fees for a significant portion of 2020, the resulting increase in membership created an overall surplus for the CRTO in registration fees

- d. Timelines
- i) Describe any improvements/changes implemented in the last year

No changes last year.

ii) Describe the impact of the improvements/changes on applicants

No changes last year.

iii) Describe the impact of the improvements/changes on your organization

No changes last year.

e. Policies, procedures and/or processes, including by-laws

- i) Describe any improvements/changes implemented in the last year
- Emergency Registration Policy (detailed above in section a) The Emergency Registration
 policy allowed the CRTO to expedite the registration process during emergencies or health
 crises such as COVID-19 by eliminating barriers to registration. The Emergency Registration
 policy gave the Registrar's discretion to register applicants without having met certain
 exemptible registration requirements (e.g., currency requirements, and registration-related

fees). The Emergency Registration policy is applicable to individuals who retired or resigned with the CRTO, members who are in the Inactive class of registration, and respiratory therapy students.

• Retired or Resigned Members:

Individual who has retired/resigned with the CRTO and meet the currency requirements as outlined in the Currency policy, the Registrar will issue a certificate of registration along with any applicable terms, conditions, or limitations the Member held previously. Individuals who have not practiced within the last two to five (2-5) years, the Registrar will register the individual and apply terms, conditions, or limitations on the certificate of registration in accordance with the Registration Currency policy. Applicants who have a currency gap of more than five (5) years will be referred to the Registration Committee for consideration.

• Inactive Class of Registration:

Members who are in the inactive class and who have practiced respiratory therapy within the last two (2) years are considered to have met the currency requirements. The Registrar will issue the certificate of registration along with any applicable terms, conditions, or limitations the Member held prior to going Inactive. Applicants who have not practiced within the last two to five (2-5) year, the Registration Committee grants the Registrar authority to register the individual and apply terms, conditions, or limitations on the certificate of registration in accordance with the Currency policy. Applicants who have a currency gap of more than five (5) years will be referred to the Registration Committee for consideration.

• Respiratory Therapy Students:

RT students who are enrolled in a recognized program and who are within ten weeks of successful completion of the program may be considered for registration in the Graduate class. The registration is contingent on the confirmation from the educational program that the applicant has completed the program.

• Out of Province Applicants:

Applicants from other provinces wishing to be registered with the CRTO will be registered in accordance with the Labour Mobility: Applicants from Regulated Canadian Jurisdiction policy and the Currency policy.

2. <u>Unauthorized Use of Title and Holding Out Prior to Registration Policy</u> – At the September 14, 2018 Registration Committee meeting, the Registration Committee reviewed the definition of "good standing" and amended the title from the "Determining Good Character of Applicants policy" to the "Determining Applicants' Suitability to Practice policy. Amendments were also made to the to the <u>Unauthorized Use of Title and Holding Out Prior to Registration policy</u> to reference "Determining Applicants' Suitability to Practice policy". The amendments to the Unauthorized use of Title and Holding Out Prior to Registration Policy was approved by Council on March 6. 2020.

3. <u>Inactive Certificate of Registration Policy</u> – The <u>Inactive Certificate of Registration policy</u> has been revised and approved by CRTO's Council on March 6, 2020. Revisions have been made to page two of the policy to add in bolded text: "Inactive Members who have practiced within two years immediately preceding their application for reinstatement will generally satisfy the requirement referred to in section 62(2)(c), unless the CRTO is aware of information that could reasonably indicate a concern with respect to the Member's knowledge, skill and/or judgment." And remove "by policy satisfy the requirement referred to in section 62(2)(c).

On page three of the Inactive Certificate of Registration Policy #5 in bolded text is added, the following criteria may be used by the Registration Committee to determine which outcome is most appropriate:

- 1. time since last practice,
- 2. nature and intensity of last practice,
- 3. quality and quantity of efforts to maintain currency while not practising,
- 4. the applicant's re-entry plan,
- 5. health information that suggests the possibility of impaired judgment.

The revised Inactive Certificate of Registration Policy allowed the Registration Committee to consider a Member's judgment under section 62(2)(c) of the Respiratory Therapy Act, and possibly place terms, conditions, or limitations, or deny reinstatement to the General class of registration until such time a health inquiry can be concluded.

- 4. <u>National Competency Framework (NCF)</u> the National Alliance of Respiratory Regulatory Bodies developed the entry-to-practice competencies for Respiratory Therapists. In January 2020, the National Competency Framework (NCF) replaced the previous <u>National Competency</u> <u>Profile (NCP)</u>. The NCF was developed in 2016, the NCF outlines the national standards of competencies required for entry-to-practice and therefore it is the benchmark for credentialing and licensing. Part 1 of the 2016 NCF includes the evaluation criteria required for accreditation purposes, and Part 2 provides guidelines for the Respiratory Therapy profession as they move forward in their career path. Full details with regards to the NCF can be found here: <u>National Competency Profile/Framework – The National Alliance of Respiratory Therapy Regulatory Bodies (nartrb.ca).</u>
- 5. <u>Registration and Use of Title Professional Practice Guideline (PPG)</u> The <u>PPG</u> is designed to assist the CRTO Members with their understanding of the legislative and regulatory parameters that shape their professional practice. PPGs are reviewed every five years (or sooner if necessary) and revised as required. Staff conducted a detailed review of the PPG and amendments were made to the following:
 - the role that PPGs and other CRTO documents play in determining whether the appropriate standards of practice have been met;
 - link provided to Am I Practicing Fact Sheet (page 7);
 - removed information regarding tracheostomy tub changes and prescribed procedures below the dermis (page 7-8);

- o updated Standards of Practice link (page 10);
- streamlined information regarding the CRTO Public Register and Duty to Report (page 12); and
- o removed glossary (page 15).

The PPG was circulated to the membership, along with a brief consultation survey. After which, it was approved for publication by Council on March 6, 2020.

- ii) Describe the impact of the improvements/changes on applicants
- Emergency Registration Policy This policy allowed CRTO staff to process applicants in a timely manner to assist with the emerging health emergency. Under this policy, applicants can submit applications without paying the application fee. Applicants that are approved for registration can also have their registration fees deferred for a period of six (6) months. The Emergency Registration policy also gave power to the Registrar to register individuals who do not meet the two (2) year currency requirement. It allowed the Registrar to register individuals who have two to five (2-5) years of currency gap and apply terms, conditions, or limitations on their certificates in accordance with the Currency Policy. Individuals who are applying with more than five (5) years of currency gap are referred to the Registration Committee for consideration.

Respiratory therapy students who are within ten weeks of successful completion of the program can also apply under the Emergency Registration policy to be registered contingent on the CRTO receiving confirmation from the educational program that the student has completed the program.

- 2. <u>Unauthorized Use of Title and Holding Out Prior to Registration Policy</u> No impact to applicants, the changes were made to reflect the correct the name of the policy.
- 3. <u>Inactive Certificate of Registration Policy</u> The revised policy allows the Registration Committee to consider an applicant's health information that suggests the possibility of impaired judgement and not an automatic approval of a Member's request to be reinstated from Inactive Class to General Glass of Registration as long as they have met criteria (a) and (b) of <u>section 62(2) of the Respiratory Therapy Act</u>. The revised policy also aligns better with the intent of the legislation as it also captures section 62(2)(c) of the Respiratory Therapy Act.

"(2) A member who holds an inactive certificate of registration may be reissued a general or limited certificate of registration, as the case may be, if the member,

(a) applies in writing to the Registrar for reinstatement;

(b) pays the annual fee in respect of the class of certificate of registration which is the subject of the application for reinstatement together with any other outstanding fee, penalty or other amount owed to the College; and

(c) satisfies a panel of the Registration Committee that he or she possesses the current knowledge, skill and judgment relating to the practice of the profession

that would be expected of a member holding a certificate of registration of the type which is the subject of the application for reinstatement. O. Reg. 17/12, s. 1."

4. <u>National Competency Framework (NCF)</u> – The NCF was developed in 2016 and was launched in 2020, all CRTO accredited respiratory therapy program utilized the NCF and moved away from the National Competency Profile (NCP). All recent graduates of approved respiratory therapy program are deemed to have the required entry-to-practice competences in the NCF. All applicants for the General Certificate of Registration must successfully pass the Canadian Board for Respiratory Care (CBRC) examination. The respiratory therapy examination is constructed utilizing the National Alliance of Respiratory Therapy Regulatory Bodies 2016 NCF and all applicants are strongly encouraged to review the NCF.

International applicants who are not graduates of approved respiratory therapy programs are referred to the <u>Entry-to-Practice Assessment process</u>. The assessment is based on the NCF. The NCF is a list of competencies considered essential for entering the practice of respiratory therapy in Ontario.

- <u>The Registration and Use of Title PPG</u> No significant impact to applicants, updates were made to ensure members understand the role that professional practice guidelines and other CRTO documents play in determining whether the appropriate standards of practice have been met. Links on the PPG were provided for additional resources.
- iii) Describe the impact of the improvements/changes on your organization
- Emergency Registration Policy The CRTO has always had an Emergency Registration policy, which can be invoked during health emergencies or crises. This policy was amended and approved by Council in March 2020. With the Emergency Registration policy in effect, the CRTO was able to register additional respiratory therapists, who answered our call-out to assist in the pandemic. As such, for the 2020 year, we saw an increased number of applicants applying to be registered with the CRTO, resulting in increased registration revenue for the organization.
- Unauthorized Use of Title and Holding Out Prior to Registration Policy No impact to the organization, the policy was amended to reflect the name of the revised policy from Determining Good Conduct Policy to Determining Applicants' Suitability to Practice Policy.
- Inactive Certificate of Registration Policy No significant impact to the CRTO. The CRTO has always considered an applicant's health information if it was a judgement issue under section 62(2) of the Respiratory Therapy Act. The amended policy also allows for transparency and in assisting applicants in understanding why the Registration Committee is considering health statuses of applicants.

- <u>National Competency Framework (NCF)</u> National competencies are reviewed every five years by the National Alliance of Respiratory Therapy Regulatory Bodies. The CRTO ensures all references to the NCP have been amended to reference the NCF (e.g., policies, website content, guides, and communication).
- 5. <u>The Registration and Use of Title PPG</u> the Registration and Use of Title PPG was due for review as PPGs are reviewed every five years. The PPG was amended to clarify some languages in the document, and there are no substantive content changes, as such it has no impact to the CRTO and the way the organization operates.

f. Resource for applicants

i) Describe any improvements/changes implemented in the last year

No changes last year.

ii) Describe the impact of the improvements/changes on applicants

No changes last year.

iii) Describe the impact of the improvements/changes on your organization

No changes last year.

- g. Review or appeal processes
- Describe any improvements/changes implemented in the last year
 No changes last year.

ii) Describe the impact of the improvements/changes on applicantsNo changes last year.

iii) Describe the impact of the improvements/changes on your organizationNo changes last year.

h. Access to applicants' records

Describe any improvement/changes implemented in the last year
 No changes last year.

ii) Describe the impact of the improvements/changes on applicants

No changes last year.

iii) Describe the impact of the improvements/changes on your organization

No changes last year.

- i. Training and resources for registration staff, Council, and committee members
- i) Describe any improvements/changes implemented in the last year

Members of the Registration Committee and staff attended a training session focused on decision making, dealing with special considerations, and issues related to human rights and anti-discrimination.

Assessors who take part in the assessment process were offered training sessions on conducting behaviour-based interviews and clinical skills assessments.

ii) Describe the impact of the improvements/changes on applicants

The CRTO takes measures to ensure that those involved in registration decisions have the skills and knowledge necessary for unbiased and objective decision making. These steps include ongoing training for Registration Committee members and assessors.

iii) Describe the impact of the improvements/changes on your organization

The CRTO takes measures to ensure that those involved in the assessment process have the skills and knowledge necessary for unbiased and objective decision making. Assessors involved with the assessment process receive ongoing training.

- j. Mutual recognition agreements
- i) Describe any improvements/changes implemented in the last year

No changes last year.

ii) Describe the impact of the improvements/changes on applicants

No changes last year.

iii) Describe the impact of the improvements/changes on your organization

No changes last year.

k. Describing any improvements/changes implemented in the last year

i) Describe any improvements/changes implemented in the last year

No changes last year.

ii) Describe the impact of the improvements/changes on applicants

No changes last year.

iii) Describe the impact of the improvements/changes on your organization

No changes last year.

I. Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year

No changes last year.

Provide any additional information: N/A

Quantitative Information

The following quantitative information is collected for the purpose of observing statistical changes and trends related to application, licensure, appeals and staffing year over year.

a. Languages

Indicate the languages in which application materials and information about the application process are available.

Language	Yes/No
English	Yes
French	Yes

Other (please specify): N/A

b. Gender applications

Indicate the number of applicants in each category as applicable

Gender	Number of applicants
Male	67
Female	173
None of the above	0

Additional comments:

c. Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender	Number of members
Male	995
Female	2713
None of the above	0

Additional Comments: This is the number of members as of December 31, 2020.

For the following sections d, e & f, the OFC recognizes that the term <u>initial education</u> infers that applicants may receive their education in multiple jurisdictions.

For the purpose of these questions, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

d. Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education in the profession or trade

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
199	21	7	India – 7 Nigeria – 1 Philippines – 4 Syrian Arab Republic - 1	0	240

Additional comments: N/A

e. Jurisdiction where applicants who became registered members obtained their initial education

Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education in the profession or trade.

Ontario	Other	USA	Other	Unknown	Total
	Canadian		International		
	Provinces		(list countries		
			and # of		
			applicants)		
177	17	3	India - 1	0	198

Additional comments: N/A

f. Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
3427	198	68	China – 2 India – 5 Iran – 1 Philippines – 6 Venezuela – 1	0	3708

g. Application processed

Indicate the number of applications your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e., <u>before</u> they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to	Ontario	Other	USA	Other	Unknown	Total
December 31, 2020		Canadian		International		
		Provinces				
New applications	199	21	7	13	0	240
received						
Applicant actively	20	2	4	12	0	38
pursuing licensing.						
Those who had some						
contact with your						
organization in the						
reporting year						
Inactive applicants.	0	0	0	0	0	0
Those who had no						
contact with your						
organization in the						
reporting year.						
Applicants who met all	1	2	0	0	0	3
requirements and were						
authorized to become						
members but did not						
become members						

Applicants who became	160	15	3	1	0	179
fully registered members						
Applicants who were	1	0	0	0	0	1
authorized to receive an						
alternative licence but						
were not issued a						
licence						
Applicants who were	17	2	0	0	0	19
issued an alternative						
class of licence*						

 An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments: N/A

h. Classes of certificate/licence

Provide a description of the classes of certificate/license offered by your organization. You should have at least one class listed.

#	Certification	Description
1	General	A General Certificate of Registration is issued to an individual who has met all academic requirements and has successfully completed the registration examination or evaluation approved by the College. If a Member holds a General Certificate of registration; he/she must use the designation RRT and may use "Registered Respiratory Therapist" or "Respiratory Therapist" as his/her professional title.
2	Graduate	A Graduate Certificate of Registration is issued to an individual who has met all academic requirements but has not yet successfully completed the registration examination approved by the College. If a Member holds a Graduate Certificate of Registration, he / she must use the designation GRT and may use "Graduate Respiratory Therapist" as his/her professional title. The following conditions apply to a Graduate Certificate of Registration: The (Graduate) member shall, (1) at the first reasonable opportunity, advise every employer of any terms, conditions and limitations that apply to the member's graduate

		certificate of registration if their employment is in the field of Respiratory Therapy;
		(2) only perform a controlled act that is authorized to the profession if it is performed under the general supervision of a member of a CRTO within the meaning of the Regulated Health Professions Act, 1991 who, the member holding the graduate certificate has reasonable grounds to believe, is authorized to perform the controlled act and is competent to do so and who is available to be personally present at the site where the authorized act is performed on ten minutes notice;
		(3) not delegate a controlled act;
		(4) not perform advanced prescribed procedures below the dermis;
		(5) not perform authorized act #5 administering a prescribed substance by inhalation"; and
		(6) not perform a tracheostomy tube change for a stoma that is less than 24 hours old.
		A graduate certificate is deemed to have been revoked 18 months after its initial date of issue.
3	Limited	Limited Certificates of Registration were issued to individuals who had not met all requirements for a General Certificate of Registration but provided sufficient evidence to a Panel of the Registration Committee of their competence to practice in a defined area of the scope of practice of the profession. (CRTO stopped issuing Limited Certificates of Registration on February 25, 1999). If a Member holds a Limited Certificate of Registration, he / she must use the designation PRT and may use "Practical Respiratory Therapist" as his/her professional title.
4	Inactive	A Member registered with a General or Limited Certificate of Registration may apply for an Inactive Certificate of Registration provided he/she is not practising the profession in the broadest sense of that phrase.
		The following conditions apply to an Inactive Certificate of Registration:
		The (Inactive) member shall not,

(a) engage in providing direct patient care;
(b) use his or her professional title or designation;
(c) supervise the practice of the profession; or
(d) make any claim or representation to having any competence in the profession.

Additional comments: N/A

i. Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e., <u>before</u> they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to	Ontario	Other	USA	Other	Unknown	Total
December 31, 2020		Canadian		International		
		Provinces				
Applicants that were	11	1	3	3	0	18
subject to an internal						
review or that were						
referred to a statutory						
committee of your						
governing council, such						
as Registration						
Committee						
Applicants who initiated	0	0	1	0	0	1
an appeal of a						
registration decision						
Appeals hear	0	0	0	0	0	0
Registration decisions	0	0	0	0	0	0
changed following an						
appeal						

Additional comments: Appeal withdrawn by the Applicant, and Health Professions Appeal and Review Board closed the file before a hearing was scheduled.

j. Paid Staff

Provide the number of paid staff employed by your organization in the categories shown, as of December 31, 2020.

You may use decimals if you need to count half units. For example, on full-time employee plus one part-time employee will be equivalent to 1.5 employees.

Category	Number of staff
Total number of staff employed by the regulatory body	9
Number of staff involved in the appeals process	2
Number of staff involved in the registration process	3

Additional comments:

Submission

Name of individual with authority to sign on behalf of the organization: Title: Carole Hamp, Acting Registrar Date: April 26, 2021