



College of Respiratory
Therapists of Ontario

Ordre des thérapeutes
respiratoires de l'Ontario

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Suzanne McGurn, Assistant Deputy Minister
Health Human Resources Strategy Division
Ministry of Health and Long-Term Care
900 Bay Street
Macdonald Block, 2nd Floor, Room M2-61
Toronto, ON M7A 1R3

Dear Assistant Deputy Minister,

Re Transparency Priorities and Initiatives

The College of Respiratory Therapists of Ontario (CRTO) has been dedicated to the values of transparency, accountability, fairness, openness and effectiveness throughout its tenure as a health regulatory body. The CRTO believes that good governance will benefit all stakeholders and bolster public confidence in the self-regulatory framework. Over the past decade the CRTO has initiated many policies, processes and tools to improve the public's access to information.

Existing Measures

Governance

- In 2007, the CRTO developed a series of "guiding questions" for decision-making, drawn directly from the objects of the CRTO and referred to as the Evergreen Questions. The Evergreen Questions are posted on the website and in the boardroom, making the decision-making process transparent. In addition, a decision-making tool for each Committee and Council decision, consisting of a briefing note/backgrounders on the issue, information both pro and con on the issue at hand, and a checklist of questions drawn from the Evergreen Questions was designed to help the Council and Committee members make their decisions in the public interest. This also helps to ensure that a member's personal views or biases are mitigated, enhancing objectivity and impartiality.
- The Strategic Plan and Communications Plan are posted on the CRTO website.
- For all Council meetings, the date/time, location and agenda are posted on the website and all Council meetings are open to members and the public.
- The approved Council meeting minutes are posted on the website for 2 years following the meeting (and by request for an indefinite period afterwards) and a brief Council meeting recap is published in the eBulletin (newsletter) after every Council meeting.



- The membership of every Committee is posted on the website, allowing anyone who interacts with the CRTO to identify anyone who they believe would have a conflict of interest with their particular issue.
- Annual reports are all posted online and are written with the same approach as the website – simple, accessible language that allows a reader to understand the activities and current state of the CRTO for any given year.
- Any individual who wishes to seek election or nomination to a committee or working group must declare any and all affiliations at the time of application, facilitating the identification of any conflict of interest.
- Each candidate must provide a written statement of intent and a recent photo, both of which are distributed to the voters to assist them in identifying the individual for whom they're voting and to provide an opportunity to initiate a conversation with any candidate who is seeking election for a reason other than working in the public interest.
- Elections are scrutinized by an independent auditing and accounting firm to ensure that there is no tampering. The firm provides the results of the election to us in a formal statement that includes an accounting of votes cast, spoiled, etc. and is distributed to the membership and posted on the website to demonstrate the objectivity and impartiality of the CRTO in the electoral process.
- In November 2014, Council adopted the Transparency Principles developed by the Advisory Group for Regulatory Excellence (AGRE). This reaffirms the CRTO's commitment to transparency, accountability, fairness, openness and effectiveness in all of its operations.
- In November 2014, the CRTO hosted an education event for members and students to give them a candid overview of the College and other relevant provincial and national organizations that play roles in the education, regulation and ongoing support of Respiratory Therapists in Ontario.

Information Technology

- In October 2013 the CRTO launched a re-designed website. The revised format includes sections dedicated to all major stakeholder-groups: Public, Members, Employers, Students and Applicants. Council recently reaffirmed that the website will continue to be the main communications vehicle.
- A significant amount of content was added to the website to benefit healthcare consumers. For example, under *Respiratory Health Information* a page dedicated to "What you need to know about home oxygen" was developed to help the public understand the professionalism expected of Registered Respiratory Therapists. Our aim was to assist the public in making more informed choices about the care they receive from Respiratory Therapists in the burgeoning community setting.
- Google™ search capabilities were added to the website to provide a robust search protocol of which many of the public would be familiar.
- Diversified technology usage to provide information through a number of platforms including on-demand videos, eLearning modules, blogs, Twitter™, and eBulletins (electronic newsletters) that can be accessed through the website or to which free email subscriptions are available to any interested party.
- Online submission forms were added to the website to facilitate the submission of concerns or complaints regarding Respiratory Therapists.



- A directory of all staff is available on the website, including a description of each staff member's role. This makes it easy for members and the public to contact the CRTO and direct their inquiry to the appropriate individual.

Complaints & Discipline

- Decision making tools were developed for panels of the Inquiries, Complaints and Reports Committee to assist them with interpreting the legislation and being consistent in their approach.
- Policies regarding the disclosure of material to complainants and members were developed to ensure that all parties were receiving all relevant information to enable them to navigate the process.
- A policy that reprimands ordered by Discipline panels will be held in public rather than in private was developed.
- When any matter is referred to the Discipline Committee, the full Notice of Hearing and a detailed list of allegations are included on the member information in the Public Register.
- A flag feature was added to the database that displays on the Public Register indicating at a glance which members have current/past Discipline referrals.
- All upcoming hearings are posted on the website; notices remain until the Decision & Reasons are available and added to the Public Register.
- Amendments to the Professional Misconduct Regulation have been submitted to MOHLTC and were posted on the government registry for public consultation. The proposed amendments better address concerns raised by individuals who are not patients (e.g., colleagues, families of patients, etc.)

Registration

- By-Laws were amended to expand the information included on the Public Register, adding: the address of every employer (no limit to the number); main area of practice for each employer; members' current registration status (contemporaneous, not just renewal); class of certificate; and, reason(s) for cessation of registration.
- The Public Register was reprogrammed to synchronize with the CRTO's registration database, ensuring that any changes to a member's information (such as terms, conditions or limitations) are contemporaneously displayed.
- The link to the Public Register has been prominently displayed on the Home page, the Public Tab, and the Employer tab of the website.
- A flag feature was added to indicate at a glance which members have terms, conditions or limitations on their certificate. Details are then available with one additional click.
- Search feature allows searching for members with terms, conditions and limitations, making it easier for employers or members of the public to identify restrictions on practitioners
- The changes from 3 different regulation amendments were consolidated to provide one updated, common set of terms, conditions and limitations for Graduate members, making it easier for an employer to understand the constraints on practice of a new graduate.
- To enhance the transparency of the registration process for applicants, several links were included on the website, including links to the body that accredits educational programs in Canada (the Council on the Accreditation of Respiratory Therapy Education - CoARTE) and to the accredited programs themselves, the organization who develops and administers the entry-to-practice exam used by the CRTO (the Canadian Board for Respiratory Care – CBRC), and the



list of competencies an individual is required to hold at the entry-to-practice level (the National Competency Profile).

- Annual reports from the Office of the Fairness Commissioner are posted on the website.
- All of application, assessment and registration information for internationally educated applicants is posted on the website in a dedicated area.

Quality Practice

- An overview and outline of the Quality Assurance process used by the CRTO is available on the website.
- Information about the random selection process for practice audits is posted on the website.
- A professional development framework, entitled GROW, was created to articulate the characteristics that contribute to the development of a well-rounded Respiratory Therapist. The characteristics, or domains include: clinician, educator, communicator, innovator, health systems navigator, collaborator, leader and health advocate.
- All practice standards, practice guidelines, practice FAQs and position statements, as well as the GROW framework, are available on the website for anyone to access, allowing the public to be clear on the standards of care they can expect from Respiratory Therapists.

Future Activities

Council approved a Transparency Improvement Plan that sets out how the CRTO will prioritize efforts to enhance transparency in the coming years. These efforts include:

1. The CRTO will continue to monitor the steps taken by AGRE and other Colleges regarding disclosure of the information on the public register categorized as Phases I and II. This will ensure the CRTO is acting in a manner consistent with other health regulators and governing in an accountable and collaborative way:

Phase I

- Date of referral to Discipline Committee
- Discipline Committee status
- Full notice of hearing
- Relevant criminal findings of guilt
- Relevant bail conditions
- Non-members practising illegally

Phase II

- Names of former members (fact + date of death, if known)
 - Health facility privileges
 - Relevant criminal charges
 - Known licenses in other jurisdictions
 - Known discipline findings in other jurisdictions
 - Discipline Committee – no findings
 - Undertakings
 - ICRC oral cautions
 - Specified CEducation or Remediation Programs (SCERPs)
2. Making transparency a key focus in the February 2015 review of the strategic plan, including integration of AGRE transparency principles into CRTO functions.



3. Reviewing and revising elections practices from a transparency perspective (e.g., provide more information about priorities of the organization for the upcoming electoral period, candidate background information, and declaration of candidate affiliations) by March 1, 2016.
4. Reviewing and revising the CRTO's *Evergreen Questions* to include transparency principles and integrate into decision-making approach by March 1, 2016.
5. Enhancing the public section of the CRTO website (e.g., QA stats, what to expect from an RT) by March 1, 2016.
6. Developing and implementing a policy consultation process by March 1, 2016.
7. Enhancing the annual report to articulate issues raised by stakeholders and the CRTO's responses by March 1, 2016.
8. Reviewing and revising existing CRTO By-Laws, policies, and documents directed at members and the public from a transparency and accessibility perspective, and for the purpose of identifying high priority items for French translation by March 1, 2017.

The CRTO's efforts to enhance transparency, accountability, fairness, openness and effectiveness will also include the development of an overarching Accountability Framework that ties together all measures of accountability affecting the College and its members. Recognizing that accessibility is key to good governance, the goal of the Accountability Framework is to make it easy for members, the public and other stakeholders to understand how self-regulation works, and why it is important to quality care and a high functioning health care system.

Sincerely,

Dave Jones, RRT
President