

ASSESSMENT REPORT FOR College of Dental Hygienists of Ontario (CDHO)

1. SPECIFIC DUTY- INFORMATION FOR APPLICANTS		
Legislation: RHPA, Schedule 2, s. 22.3		
22.3 The College shall provide information on its website with respect to the requirements for registration, the procedures for applying for registration and the amount of time that the registration process usually takes.		
DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment¹	Information Source²
1. Good: All of the information referred to in the good practices in this section is on the regulatory body's website, for applicants and for people intending to apply.	OI	CDHO website, by-laws. Fair Registration Practices (FRP) Report 2010 Section 1, Entry-To-Practice (ETP) Review Report 2010 Section: Review of fees
<i>Comments: Once all of the improvements recommended in this section have been implemented the practice will have been satisfied and the OI will change to a Y.</i>		
2. Required: The regulatory body describes requirements for registration on its website, including the ways in which requirements may be met and/or the criteria that must be met for the requirements to be satisfied.	Y	CDHO website. FRP Report 2010 Section 1b-c, 8a, Audit Report C1c p. 23.
<i>Comments: The CDHO's website is the main vehicle that the CDHO uses to communicate with its applicants. The website provides extensive information about the registration process. Information about the proposed changes to the CDHO's registration regulation (O. Reg. 218/94) is clear and tells applicants how this regulation will affect registration. Requirements for registration are outlined on the website and are separated by accredited and non-accredited programs, international programs and other Canadian jurisdictions. In addition, the website contains FAQs and checklists for each. Registration information is available in French online.</i>		
3. Good: The regulatory body provides information about the requirements that may be satisfied through acceptable alternatives.	Y	CDHO website and FRP Report 2010 1e, Audit Report C1d p.27.

¹Legend: Y=Yes, N=No, OI= Opportunity for Improvement, NA= Not Applicable to the regulatory body, TBD= To be determined in consultation with the regulatory body

*Note that 'TBD' means the OFC was not able to identify sufficient information on which to base an assessment.

²This column contains the source of the information the OFC used to make the assessment.

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<i>Comments: The CDHO identifies the requirements that may be satisfied through acceptable alternatives and describes the process involved. According to the FRP Report 2010 if an applicant is not eligible to participate in the National Dental Hygiene Certification Board exam the applicant may apply to have her/his course of study reviewed by the CDHO Registration Committee. The process for assessing the course is based on the same criteria as the National Dental Hygiene Certification Board (NDHCB). However, there is the possibility that the applicant will submit additional information relating to the courses that may be relevant and were not received by the NDHCB. If it is considered equivalent the applicant will be permitted to take the CDHO written competency evaluation.</i>		
4. Good: The regulatory body provides information about all requirements that are subject to exemptions.	Y	CDHO website, Audit Report D4 and 5 p.198-202.
<i>Comments: The CDHO specifies on its website, under the Registration tab and separated by program (accredited etc) that which are identified in the regulation as non-exemptible requirements.</i>		
5. Good: If a language requirement can be met in English or French, the regulatory body provides registration information in English and French.	OI	CDHO website, FRP Report 2010 Section 1b and c, Annual Meeting
<i>Comments: The CDHO does provide certain information in French on its website. The CDHO specifies that language proficiency is determined by the ability of the applicant to successfully complete the examinations in either French or English, but this information is difficult to find on the CDHO website. The OFC recommends that the CDHO provide this information in the International Programs section and in the Graduate Requirements section, in all places where the language proficiency requirement is stated.</i>		
6. Good: If a regulatory body has any requirements for personal attributes such as “good character,” it describes the criteria that are used to assess these requirements.	OI	CDHO website, FRP Report 2010 Section 1b-c, 8.
<i>Comments: The CDHO will add “good character” to its registration regulation. The OFC recommends that the CDHO:</i>		
<ul style="list-style-type: none"> • Describe “good character” clearly on its website. • Use objective measures to identify whether an applicant meets this requirement (for example, a police record check). 		
7. Required: All the steps in the registration process are described clearly on the regulatory body’s website, including any qualifications assessment processes.	Y	CDHO and NDHCB websites, FRP Report Section 1a and f, 8.
<i>Comments: All the steps in the registration process are described on the website including any third party requirements. For Non-Accredited Programs the applicant must first be assessed by the NDHCB to determine whether they are eligible to take the exam. The CDHO website provides information and link to the NDHCB website on its site.</i>		
8. Good: The regulatory body identifies the steps in the registration process that an applicant can do or start outside of Canada, such as qualifications assessment, language assessment, and examinations.	Y	CDHO website, Annual Meeting
<i>Comments: Applicants can complete most steps in the registration process outside of Canada. The CDHO will accept and process an application for registration from an applicant from outside of Canada. Request for an application package and translations (for those who have documents in languages other than English or French) can have the official translation done outside of Canada, if they wish. Language proficiency is assessed informally through ability to successfully complete the written</i>		

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<i>examination and clinical competency assessment. Jurisprudence Education Module can be completed online anywhere in or outside of Canada. The NDHCB does accept external educational evaluations (e.g., through World Education Services (WES)) and those can be completed anywhere in or outside of Canada.</i>		
9. Good: The regulatory body describes the role of any third-party organizations that applicants may come in contact with during the registration process, such as qualifications assessment agencies and organizations that conduct examinations or provide training programs.	Y	CDHO website and FRP Report 2010 Section 9a.
<i>Comments: The College explains and the link is provided on their website.</i>		
10. Required: On its website, the regulatory body informs applicants about the following items related to assessment of qualifications: a) the criteria that qualifications assessments are based on b) how those criteria are linked to the requirements/standards for entering the profession c) the costs d) the time needed e) opportunities to appeal the results of a qualifications assessment or have the results reviewed f) any policies and procedures relating to accommodation of special needs	Y	CDHO website and FRP Report 2010 Section 8 and 9.
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<i>Comments: The criteria are based on dental hygiene competencies, standards of practice and accreditation requirements which are outlined on the NDHCB website. The costs, time needed, opportunities for appeal and policies for accommodation are found on both the CDHO and NDHCB websites and in the FRP Report 2010.</i>		
11. Good: The regulatory body informs applicants about any qualifications assessment methods it uses.	Y	CDHO and NDHCB websites and FRP Report 2010 Section 8 and 9.
<i>Comments: CDHO relies on the NDHCB for certain qualifications assessments and provides the links to NDHCB. NDHCB provides qualifications assessment methods on its website, mainly in it Blueprint for the NDHCB EXAM.</i>		
12. Good: The regulatory body informs applicants about which documents are kept by the regulatory body and which documents are returned to applicants upon written request.	OI	CDHO website, Annual Meeting
<i>Comments: The CDHO requests notarized or certified true copies of all documents. Documents are not returned to applicants and are kept by the College for the time specified in the CDHO Retention Policy (internal document). The CDHO acknowledges that this information is not available on its website. The OFC recommends that the CDHO state, in the Registration area of its website and on its registration checklist, its policy for retaining (and not returning) applicants' registration application documents.</i>		

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13. Required: The regulatory body provides information on its website about how long the registration process usually takes.	Y	FRP Report 2010 Section 1n, Audit Report C1b p. 16
<i>Comments: This information is limited. The College does provide an estimated time frame for the entire process for both graduates of accredited programs and graduate of non-accredited programs.</i>		
14. Good: The regulatory body provides information about the estimated time for each stage of the application process that is under the body's control. When timelines vary, a range or maximum amount of time is provided. When timelines vary by application type, the different timelines are outlined. Information about variables that may slow down the normal process is included, if these exist.	OI	FRP Report 2010 Section 1n, Audit Report C1b pp. 16-19, Annual Meeting
<i>Comments: Timelines for the registration process can vary. (For example, after successfully completing the NDHCB exam applicants who are graduates of accredited programs can become registered in as little as 10 business days. But graduates of Non-Accredited Programs must also successfully complete a provincial clinical competency assessment, which typically adds six-to-eight months to the registration process.) The different timelines for each stage of the application are not clearly described on the website or in other information for applicants. The OFC recommends that the CDHO provide additional clarification (similar to the information provided in the CDHO's FRP Report 2010 or its Audit Report) about the various estimated times for each stage of the application.</i>		
15. Good: The regulatory body makes available a fee scale that shows all registration fees that are under the regulatory body's control.	Y	CDHO website and ETP Review Report 2010 Review of Fees, FRP Report 2010 Section 1o, 2, and Audit Report C1e p. 32., Annual Meeting
<i>Comments: The CDHO has listed all fees in the fee section of the by-laws and in the registration application checklist, except the fees associated with the NDHC Examination. This fee was included as part of the College's assessment of its fees in the ETP Review Report 2010.</i>		
16. Good: The regulatory body identifies other costs associated with the registration process, including third-party assessments. This enables the applicant to approximate the total cost of the registration process.	OI	CDHO website and ETP Review Report 2010 Review of Fees, Annual Meeting
<i>Comments: The CDHO acknowledges that there is a gap in information provided with regard to the fees associated with third-party assessments, such as the NDHCB EXAM. The OFC recommends that the CDHO provide a direct link in the Registration section of its website to the fee information on the NDHCB EXAM.</i>		
17. Good: The regulatory body provides information or a referral to sources of information (for example, a website link) about any resources and supports that are available to applicants during the registration and assessment process. <i>Examples of resources and supports include: examination blueprints, practice tests or examinations, sample assessment questions, programs for orientation to the profession, bridging programs, occupation-specific language training opportunities, mentorship opportunities, work experience opportunities, and online tools to</i>	Y	CDHO website and FRP Report 2010 Section 5.

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<i>self-assess language or professional qualifications.</i>		
<p><i>Comments: The CDHO provides the following resources:</i></p> <ul style="list-style-type: none"> • <i>Application packages to potential applicants.</i> • <i>Information regarding the registration process and the clinical competency evaluation is available on the CDHO website.</i> • <i>A Career Map is also posted on the CDHO website to assist internationally trained applicants.</i> • <i>Students in Ontario accredited dental hygiene programs are provided with application packages prior to their graduation so that they are aware of what documents and/or requirements need to be submitted /met in advance of their graduation.</i> • <i>The CDHO provides a USB stick called the Registrant’s Resource which contains relevant information to assist applicants in becoming familiar with the rules and regulations that govern dental hygiene in Ontario.</i> • <i>An online Jurisprudence Education Module is available on the CDHO website.</i> • <i>Presentations are conducted to prepare candidates for the clinical competency evaluation.</i> <p><i>The NDHCB has documents available to assist candidates prepare for its examination. The documents include an examination blueprint and a guide to candidates for the examination. The NDHCB has also developed a 75-item preparatory test available to examination candidates at a cost of \$20.</i></p>		
18. Good: Applicants and individuals intending to apply can access information in multiple formats (such as downloading the information from the regulatory body’s website, having it mailed to them by the regulatory body upon request, or obtaining it orally).	Y	CDHO website and FRP Report 2010 Section 1, Audit Report C1a. p.11
<p><i>Comments: As was found in the Audit Report, the College provides information about its registration practices to persons applying or intending to apply for registration through different communication methods.</i></p> <p><i>1. CDHO provides information about its registration practices through the CDHO web site, www.cdho.org.</i></p> <p><i>a) On the web site's home page are nine clearly labelled tabs for a web site user to choose from. Sixth across the list is a tab called "Registration".</i></p> <p><i>b) Once the web site user selects "Registration", a drop down menu shows eleven topics for a web site user to choose from.</i></p> <p><i>c) Within these eleven topics, the CDHO provides information about its registration practices. In particular, the topics covered are: “about registration”, “categories of registration”, “requirements”, “clinical competency evaluation”, “educational institutions”, “private non-accredited”, “renew your registration”, “registrant address change”, “forms”, “jurisprudence registration dates”, and “office of the fairness commissioner”.</i></p> <p><i>2. CDHO provides information about its registration practices in person. The Deputy Registrar, administration assistant in the registration department, and receptionist are available to meet with applicants regarding their applications. This support is provided to walk-ins if they are available, or by appointment.</i></p> <p><i>3. CDHO provides information about its registration practices by mail.</i></p>		

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<p>4. CDHO provides information about its registration practices through e-mail.</p> <p>5. CDHO provides information about its registration practices by telephone and fax.</p> <p><i>In addition to the five methods noted above, the CDHO also forwards application packages to all students in accredited programs.</i></p>		
<p>19. Good: Registration information, including information that applies specifically to internationally trained individuals, is complete, clear, and easy to find.</p> <p><i>For example: The information avoids unnecessarily complicated language and minimizes technical language or jargon. No rules or policies that relate to registration are unwritten.</i></p>	Y	CDHO website and FRP Report 2010 Section 1
<i>Comments: Information that is specifically for international graduate is complete, clear, and easy to identify on the CDHO website.</i>		
<p>20. Good: Registration information is current and accurate.</p>	Y	FRP Report 2010, Annual Meeting
<i>Comments: The College reviews and ensures accuracy of registration information when there are changes to the information (e.g., as a result of regulation changes).</i>		

2. SPECIFIC DUTY- INTERNAL “REVIEW”³ (Referral to Registration Committee)

Legislation: RHPA, Schedule 2, s.15, s.18, s.19,

(Due to its length, the text of the applicable sections has been posted at the end of the Guide.)

DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment	Information Source
1. Required: If the regulatory body proposes to deny registration or to impose terms, conditions, or limitations on a certificate of registration, it provides an opportunity to the applicant to have the proposal or decision reviewed.	Y	FRP Report 2010 Section 6e, Audit Report C3d p. 104
<i>Comments: The College offers both reviews and appeals. It refers to matters that have been referred to the Registration Committee due to concerns relating to an applicant’s registration form or requests for an assessment of a course of study as internal reviews. The College uses the term appeals for candidates who are not satisfied with the results of their clinical competency evaluation. The applicant is provided with an opportunity to make written submissions to the Committee. The Registration Committee Panel review the application and submission made by the applicant and renders a decision. In an appeal process, a Panel of the Registration Committee would review the submission made by the candidate , the submissions made by clinical evaluators, the chief evaluator and the clinical evaluation previously provided to the candidate. The Panel reviews all the documentation and renders a decision.</i>		
2. Good: The regulatory body ensures that it provides “reviews” from decisions within a reasonable time.	Y	FRP Report 2010 Section 6a, Audit Report C3 P.82 and D3 p. 197.
<i>Comments: Best efforts are made to provide the decision to the applicant within 45 days of the receipt of the appeal. All 2010 cases that were dealt with by the Registration Committee in 2010 met or exceeded the timelines. Audit Report confirmed that timelines were being met.</i>		
3. Required: If an applicant is referred to the Registration Committee, the applicant is informed about the statutory grounds for the referral and about his or her right to make written submissions.	Y	FRP Report 2010 Section 6e, Audit Report

³ In an internal “review”, the registrar has not made a decision but has made a proposal that results in the matter being reviewed and determined by the registration committee or analogous committee. (George M. Thomson, “Review of Appeal Processes from Registration Decisions in Ontario’s Regulated Professions”, November, 2005.)

2. SPECIFIC DUTY- INTERNAL “REVIEW”³ (Referral to Registration Committee)		
		C4 pp. 105-118
<i>Comments: The applicant is advised in the Notice of Referral.</i>		
4. Required: No one who acted as a decision-maker in a registration decision acts as a decision-maker in a “review” of that same registration decision.	Y	FRP Report 2010 Section 6d, Audit Report C4b p. 111
<i>Comments: Members of the Registration Committee who have had prior involvement with the applicant/candidate would be excluded from sitting on the Panel dealing with the current issue, according to the FRP Report 2010. Panels are also reviewed to ensure there are no conflicts of interest.</i>		

3. SPECIFIC DUTY- INFORMATION ON APPEAL RIGHTS

Legislation: RHPA, Schedule 2, s. 20, s. 21, s.22,

(Due to its length, the text of the applicable sections has been posted at the end of the Guide.)

DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment	Information Source
1. Required: Required: The regulatory body informs applicants of their right to appeal to the Health Professions Appeal and Review Board (HPARB).	Y	FRP Report 2010 Section 7 Audit Report C4a p. 105, CDHO website

Comments: According to both the FRP Report 2010 and the Audit Report, the covering letter, enclosing a copy of the decision and the reasons for the decision, advises the applicant of his or her right to appeal to the Health Professions Appeal and Review Board (HPARB) and the timeframe s/he has to submit an appeal (30 days). It also includes a copy of the section of the Act relating to the appeal procedures along with the appropriate address and contact information for submitting the request for an appeal. According to the Audit Report it reads "Please be advised that, in accordance with s.21 of the Health Professions Procedural Code (the "Code"), which is Schedule 2 to the Regulated Health Professions Act, 1991, you have the right to request either a review or a hearing before the Health Professions Appeal and Review Board. The Board is appointed by the government and is completely independent of the College. In a review, the Board will review your application and the relevant documentary evidence in the absence of the parties. In a hearing, both you and the Registration Committee will be given an opportunity to bring lawyers, call witnesses to give oral testimony and to make oral submissions. To choose either option, you must send written notice to both the Board and the College within 30 days. The written notice must specify whether you wish a review or a hearing. The following are the appropriate addresses."

4. SPECIFIC DUTY- DOCUMENTATION OF QUALIFICATIONS

Legislation: RHPA, Schedule 2, s. 22.4(1)

22.4(1) The College shall make information publicly available on what documentation of qualifications must accompany an application and what alternatives may be acceptable to the College if an applicant cannot obtain the required documentation for reasons beyond his or her control.

DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment	Information Source
1. Required: The regulatory body provides information about the documents that must accompany an application to demonstrate qualifications. This information includes the following, if applicable: a) required content of the documents b) required format of the documents, including the translation format, if applicable c) required mode of transmission of the documents (for example, some regulatory bodies require that transcripts be sent in a sealed envelope directly by the institution) d) how to contact the regulatory body to explore what alternate documentation may be acceptable, if applicants cannot get the required documentation for reasons beyond their control	Y	FRP Report 2010 Section 1g, Audit Report C5 pp.119-126, CDHO website
	Y	FRP Report 2010 Section 1, CDHO website
	Y	FRP Report 2010 Section 1, CDHO website
	Y	FRP Report 2010 Section 1h, Audit Report C5 pp.119-126CDHO website

Comments: The CDHO identifies the documents that applicants (including international applicants and graduates from non-accredited programs) must submit with their applications. This information is available through multiple access points on the CDHO website. According to the FRP Report 2010, when an applicant contacts the CDHO by email, fax or in person, they are provided with an application package which includes a guide to the process of registration. Applicants who contact CDHO by email are also referred to the website to one of the four guides available on the CDHO website (graduates of accredited dental hygiene programs, graduates of non-accredited dental hygiene programs, graduates of other Canadian jurisdictions and a Career Map for internationally trained to inform of the

<p>registration process. The CDHO requires an official transcript of the results to be submitted from the educational institute of graduation for all applicants. This is addressed in the CDHO's guides to registration and on the CDHO website. A checklist is available online for applicants to ensure they have submitted all documents required. Graduates of non-accredited dental hygiene programs (including internationally trained applicants) must have their course of study assessed to ensure that it meets the educational requirements. This evaluation is completed by the NDHCB. Information on what type of documentation is required by the NDHCB is outlined on their website (through the CDHO website links).</p>		
<p>2. Good: The regulatory body gives a website link to, or explains where to find, the documentation required by any third parties who play a role in the body's registration process.</p>	<p>Y</p>	<p>FRP Report 2010 Section 1g and 1, CDHO website</p>
<p><i>Comments: The CDHO provides direct links from the CDHO's website to the NDHCB website, which outlines what is required to apply to write the NDHCB EXAM or to have an evaluation of a program of study. NDHCB administers a national examination and conducts education evaluations, as part of the registration process.</i></p>		
<p>3. Good: The regulatory body informs applicants about missing or incomplete documentation.</p>	<p>OI</p>	<p>CDHO website, Annual Meeting</p>
<p><i>Comments: The CDHO acknowledges that this information is not currently on their website. The CDHO advises OFC that their process is to review the checklist along with the materials provided to determine whether any documentation is either missing or incomplete. The College's process is to notify the applicant within 3-5 business days regarding any missing or incomplete documentation. The only exception to this is if an applicant has checked the documentation as complete on the checklist, in this case, the CDHO assumes the material will arrive shortly, separate from the application. Given that this information is not available online, the OFC recommends that the CDHO inform the applicants of the process for dealing with missing and incomplete documentation, either by putting this in the registration section of the website or including it in the checklist document.</i></p>		
<p>4. Good: If an applicant indicates that he or she cannot get the required documentation for reasons beyond his or her control, the regulatory body has a process:</p> <ul style="list-style-type: none"> • to determine whether the documentation is in fact unobtainable • to consider and examine alternatives • if possible, to help the applicant get alternative documentation if the required documentation is unobtainable 	<p>Y</p>	<p>FRP Report 2010 Section 1h, CDHO website</p>
	<p>Y</p>	<p>FRP Report 2010 Section 1h, CDHO website</p>
	<p>Y</p>	<p>FRP Report 2010 Section 1h, CDHO website</p>
<p><i>Comments: The College determines on a case by case basis, whether an alternative document can be substituted. In some cases an alternate document has been</i></p>		

submitted and in other cases, a representative of the CDHO has written directly to the applicant's educational institution to assist in obtaining documentation. Documentation provided to the NDHCB is also accepted. Information on acceptable alternatives is available on the CDHO website and in the application packages.

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS

Legislation: RHPA, Schedule 2, s. 22.4(2)

22.4(2) If the College makes its own assessment of qualifications, it shall do so in a way that is transparent, objective, impartial and fair and, if it relies on a third party to assess qualifications, it shall take reasonable measures to ensure that the third party makes the assessment in a way that is transparent, objective, impartial and fair.

DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment	Information Source
1. Required: Qualifications assessments are based on transparent criteria, and those criteria are directly linked to the requirements/standards for entry to the profession. [Transparency]	Y	FRP Report 2010 Section 8, 1c, Audit Report C6a p.133, CDHO website

Comments: The CDHO relies on the NDHCB for the qualifications assessments required, with the exception of the Jurisprudence Education Module and clinical competency evaluations for candidates from non-accredited schools. The CDHO conducts very few credential/educational assessments (there was none in 2010) as the CDHO accepts educational assessments by the NDHCB. CDHO website indicates that fluency is determined informally through the ability of the applicant to successfully complete the written examination and clinical competency assessment. The CDHO provides a significant amount of information about the assessment of qualifications, including information about and resources for its jurisprudence education module. It also provides information about the educational and exam requirements of the CDHO's qualifications assessment agencies.

The criteria which the applicant must meet in order to satisfy the requirements/standards for entry to the profession are as follows:

a) Have graduated from a two-year accredited dental hygiene program or one considered equivalent. The CDHO Registration Committee established an equivalency process based on a review of the applicant's documents for consistency with: Accreditation Requirements for Dental Hygiene Programs, 2008 by the Commission on Dental Accreditation of Canada (CDAC), Accreditation Standards for Dental Hygiene Programs, 2006 by the Commission on Dental Accreditation, American Dental Association, CHDO's Dental Hygiene Standards of Practice, 1998, and the Dental Hygiene Program Standard, 1996 by the College Standards and Accreditation Council. The CDHO also accepts the evaluation criteria of the NDHCB which are based on national competencies required for entry to the profession. For applicants who graduated from non-accredited programs, the NDHCB requires an educational credential evaluation prior to evaluating a course of study. The NDHCB evaluation process is based on the current accreditation standards, which are updated regularly. NDHCB will also accept external educational evaluations (e.g., WES).

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- b) Have successfully completed the NDHCB Exam or, if an applicant is not eligible to take the NDHCB Exam and the Registration Committee determines that they meet the educational requirements, a provincial written competency evaluation. The NDHCB provides a blueprint for the NDHCB Exam on its website which provides direct links to the competencies evaluated in the exam. It was developed by the NDHCB, and validated by means of nationwide survey of practising dental hygienists. Both the competencies and blueprint are updated on a five-year cycle to ensure the competencies remain current.*
- c) Have successfully completed a clinical competency evaluation if s/he graduates from a non-accredited dental hygiene program. The evaluation is conducted by the CDHO with a client of the candidate's choosing. The criteria for client selection are posted on the CDHO website. The candidate is evaluated on client selection, assessment, planning, implementation and evaluation. This assessment is part of the non-exemptible requirements that an applicant must have successfully completed a course of study in dental hygiene at an educational institution that the CDHO considers to be the equivalent to an accredited dental hygiene program.*
- d) Have successfully completed the Jurisprudence Education Module. The program has been designed as a module to be completed online using realistic scenarios that dental hygienists could encounter in practice. This module has been designed to review learning that is taught in Ontario dental hygiene programs. The CDHO Registrants' Handbook should be consulted frequently throughout this module. The CDHO has reviewed all its documents and other legislation relevant to the practice of dental hygiene in Ontario to develop the Jurisprudence Education Module.*
- e) Have successfully completed an approved dental hygiene refresher course or professional competency assessment if s/he has not practiced dental hygiene in the previous three years. This is to ensure that the applicant has the competencies required for entry-to-practice.*
- f) Be reasonably fluent in either English or French. This is tested informally through the successful completion of the requirements in either English or French.*
- g) Be authorized to practise dental hygiene in Canada.*
- h) Have declared any previous offences (professional and/or criminal).*
- h) Have professional liability insurance.*

2. Good: Subjectivity in decision-making is minimized by the use of specific criteria for assessing qualifications. [Objectivity]

OI

**FRP Report
2010 Section 8a,
8i(i), CDHO
website**

Comments: The subjectivity in decision-making is minimized for the Jurisprudence Education Module through: requiring that all applicants complete this module, using multiple choice testing format, online completion and immediate computer generated results.

The clinical competency evaluation is rarely required and is used on candidates from non-accredited schools. The evaluation is conducted clinically with a client of the applicant's choosing. The criteria for client selection and all evaluation criteria are posted on the CDHO website. The candidate is evaluated on client selection, assessment, planning, implementation and evaluation. Subjectivity in decision-making is minimized through having each evaluator independently evaluate each candidate's work in teams of two. The evaluation session is timed and candidates must complete the assigned work within the timeframe. Undue tissue trauma

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<p><i>constitutes an unsuccessful result. Self-evaluation by the candidate is a critical component of the evaluation. When the educational assessment/equivalency process used internally (which is rare as these are almost completely handled through the NDHCB), each member of the Registration Committee panel is provided with a chart of competencies/criteria which each member is required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision. The CDHO does not make this information available externally because it could threaten the integrity of the process. OFC recommends that certain information be provided to applicants about the equivalency process such as the process used for determining equivalency (e.g., each member of the Registration Committee panel is provided with a chart of competencies/criteria which they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision.). The CDHO has advised that the chart used by the Registration Committee has a list of criteria/competencies assessed which is consistent with the CDAC and other organizations mentioned in specific duty 5.1, The OFC recommends that either a list of or link to these criteria/competencies be posted on the CDHO website in the registration section (Non-Accredited Programs area).</i></p>		
3. Required: Qualifications assessment criteria are applied consistently to all applicants. [Objectivity]	OI	FRP Report 2010 Section 8e, Audit Report C6a p. 133, CDHO website, Annual Meeting
<p><i>Comments: : The OFC found that the following are applied consistently with regard to the Jurisprudence Education Module:</i></p> <ul style="list-style-type: none"> • <i>The CDHO provides online resources and a USB stick called the Registrants Resource which contains relevant information to assist all applicants in becoming familiar with the legislation and regulations.</i> • <i>An online Jurisprudence Education Module is available on the CDHO website and the Registrants' Handbook containing all relevant legislation and policies.</i> <p><i>For the clinical competency evaluation: The following criteria are applied consistently:</i></p> <ul style="list-style-type: none"> • <i>The candidate is evaluated on client selection (posted online), assessment, planning, implementation and evaluation.</i> • <i>Work experience is not considered, Evaluators do not know if the candidate is a new graduate or an experienced clinician.</i> • <i>Each Evaluator works in teams of two and each candidate's work is evaluated independently by each member of the team.</i> <p><i>Educational assessments/Equivalency process (rare cases): The CDHO's Registration Committee panel uses a list of criteria/competencies to make a decision about an application from a graduate of a non-accredited program. The OFC recommends that these criteria/competencies be posted on the CDHO website in the Registration section (in the area).</i></p>		
4. Required: Assessment methods are reviewed for objectivity, validity and reliability. [Objectivity]	OI	FRP Report 2010 Section 8j

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS		
		(ii), 8k(ii), 8l(ii), Section 9. CDHO and CPO websites
<p><i>Comments: See comments in Specific Duty 5.3 for educational/equivalency assessment methods.</i></p> <p><i>At each clinical competency evaluation session, the Chief Evaluator conducts a calibration exercise with the Evaluators. If the members of the evaluation team of two do not agree on the candidate's result, then the Chief Evaluator will conduct a third assessment. At the conclusion of these sessions, a debriefing occurs and improvements are made to the system where required. Any new forms or components of the evaluation are posted on the CDHO website prior to the next clinical evaluation session.</i></p> <p><i>The CDHO has based the final Jurisprudence Education Module quiz upon materials developed by the College of Physiotherapists of Ontario (CPO) and distributed with its permission. The CPO has outlined the following assessment methods on its website:</i></p> <ul style="list-style-type: none"> • <i>The score for successful completion of a module is developed by using a highly recognized method known as the modified Angoff.</i> • <i>Each question in the item bank is given a difficulty rating by content experts. These difficulty ratings are compiled to calculate the final cut score.</i> • <i>This set standard is then used to determine each individual's successful completion.</i> • <i>Each year the College will create a new version of the module to accommodate new registrants.</i> • <i>With each new version of the module a new cut score is set dependent on the degree of difficulty of the questions included in that version.</i> <p><i>The OFC recommends that the CDHO include information on its website regarding the measures the CDHO takes to ensure objectivity, validity and reliability of the Jurisprudence Education Module, clinical competency evaluation and the educational/equivalency assessments.</i></p>		
5. Required: Information about educational programs used in qualifications assessment is current and accurate. [Fairness, Objectivity, Transparency]	Y	FRP Report 2010 Section 8d, Audit Report C6a pp. 133-135, CDHO website
<p><i>Comments: See comments for Specific Duty 5.4 for the clinical competency evaluations. The CDHO conducts very few assessments as it accepts the educational/equivalency assessment conducted by the NDHCB (last CDHO assessment conducted in 2008). When the Registration Committee does conduct an assessment, it requires the documentation relating to the course of study to be submitted directly from the applicant's educational institution and relate to the year of graduation. The criteria used are based on the current dental hygiene competencies, standards of practice and the current accreditation requirements. The</i></p>		

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS		
<i>Jurisprudence Education Module is updated in accordance with changes to the legislation and regulations.</i>		
6. Required: The results of qualifications assessment are communicated to the applicant in writing (electronically or in hardcopy). [Fairness, Transparency]	Y	CDHO Audit Report 2009 C6a pp. 133-135, CDHO website, FRP Report 2010.
<p><i>Comments: The Jurisprudence Education Module provides immediate feedback to the applicant as to whether or not they have successfully completed the module. A list of all content domains appears and indicates the applicant's results for each domain. To successfully complete the module all the 54 multiple choice questions must be answered correctly. There is no limit on the number of times you can attempt the final quiz.</i></p> <p><i>For the clinical competency evaluation: The results are forwarded by mail to all candidates within three weeks of the Clinical Competency Evaluation.</i></p> <p><i>Educational/Equivalency assessment: feedback and decisions are provided within approximately three months, starting from the time that all the required documents have been received.</i></p>		
7. Required: If an application is rejected, applicants are given written reasons. The written reasons include the identification of any criteria that the applicant did not meet. [Fairness, Transparency]	Y	CDHO website, Audit Report 2009 C6a pp. 133-135 , FRP report 2010 3a(iii).
<p><i>Comments: A report is sent to the unsuccessful applicant that was completed collaboratively by the evaluators of the educational/equivalency assessment process. It is sent with a cover letter indicating the results and appeal process. The Jurisprudence Education Module provides immediate feedback to the applicant as to whether or not they have successfully completed the module. A list of all content domains appears and indicates the applicant's results for each domain. To successfully complete the module all the 54 multiple choice questions must be answered correctly. There is no limit on the number of times you can attempt the final quiz.</i></p> <p><i>For the clinical competency evaluation: The results will be forwarded by mail to all candidates within three weeks of the Clinical Competency Evaluation.</i></p> <p><i>Educational/Equivalency assessment: feedback and decisions are provided within approximately three months, starting from the time that all the required documents have been received.</i></p>		
8. Required: Applicants have an opportunity to appeal the results of a qualifications assessment or to have the results reviewed. [Fairness]	Y	CDHO website, Audit Report 2009 C6a pp. 133-135, FRP

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS		
		Report Section 6 and 7.
<i>Comments: See comments for Specific Duty 5.7. Jurisprudence Education Module is appealable to the Registration Committee. For the clinical competency evaluation: Letters of appeal must be in writing and directed to the Registration Committee of the CDHO within 30 days. The fee to file an appeal of Evaluation results is \$100.00 payable to the CDHO.</i>		
9. Required: The regulatory body ensures that the following are done within a reasonable amount of time: <ul style="list-style-type: none"> • assessing the qualifications • communicating the results to applicants • providing reasons in writing for unsuccessful applications • [Fairness, Transparency] 	Y	CDHO website, Audit Report 2009 C6a pp. 133-135, and FRP Report 2010 Section 8h.
	Y	CDHO website, Audit Report 2009 C6a pp. 133-135, and FRP Report 2010 Section 8h.
	Y	CDHO website, Audit Report 2009 C6a pp. 133-135, and FRP Report 2010 Section 8h.
	Y	CDHO website, Audit Report 2009 C6a pp. 133-135, and

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS		
		FRP Report 2010 Section 8h.
<i>Comments: One of the recommendations from the audit finalized in December 2009 was that, once every six months, files are reviewed at random to ensure the published timelines are met by the CDHO. This recommendation has been implemented and the files selected met the published timeframes, according to the FRP Report 2010.</i>		
10. Good: Where appropriate, language tests assess occupation-specific language skills. [Fairness]	N/A	CDHO website
<i>Comments: The CDHO does not use formal language assessment.</i>		
11. Good: When language proficiency is a requirement, the level of proficiency required reflects the level required to practise the profession. [Fairness]	N/A	CDHO website,
<i>Comments: The CDHO does not use formal language assessment.</i>		
12. Good: Assessments are made free from bias and preconceived notions about any individual or group of individuals. [Impartiality]	Y	CDHO website, FRP Report 2010 Section 8 and 9, Audit Report 2009 C6a, Annual Meeting
<p><i>Comments: The OFC found the following examples of measures taken to ensure assessments are made free from bias:</i></p> <ul style="list-style-type: none"> • <i>annual training for decision makers which addresses criteria used by the Registration Committee in determining whether the applicant meets the requirements for registration, the methodology of conducting assessments and issues related to making registration decisions.</i> • <i>The Registration Committee members also receive a copy of the Registration Committee Resource Manual for reference.</i> • <i>Exams, accreditation and education assessment are completed through the use of a national third party (the NDHCB).</i> • <i>Exams are tested for validity, objectivity, and reliability and measured against entry-to-practice competencies.(NDHCB reports to CDHO representative who sits as a Governor on NDHCB)</i> • <i>Those involved in an applicant decision initially, are not involved again.</i> • <i>Special accommodations are considered on a case by case basis. Most often the request is for left handed units for the clinical competency evaluation. For other mental, physical, or emotional concerns a physician's note is required.</i> • <i>All Registration Committee members attend Managing Cultural Differences training provided through Ontario Regulators for Access Consortium (ORAC)</i> • <i>Equivalency process: each member of the Registration Committee panel is provided with a chart of competencies/criteria which they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings</i> 		

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS		
<p><i>together to come to a decision.</i></p> <ul style="list-style-type: none"> <i>Jurisprudence Education Module is online and uses standardized multiple choice assessment.</i> 		
13. Required: Regulatory bodies that rely on third-party assessments describe the measures they take to ensure that the third-party assessments are transparent, objective, impartial and fair. [Fairness, Transparency, Objectivity, Impartiality]	Y	FRP Report 2010 Section 9b, Audit Report C6a. p.134, Annual Meeting
<p><i>Comments: The NDHCB policies are transparent and are outlined on its website. In addition, a member of the CDHO administration sits as a Governor on the NDHCB, attends meetings and is provided with monitoring reports on a number of issues, including the number of requests for accommodation and the length of time it takes to conduct evaluations. The CDHO advises that it uses the Carver Policy Governance Model to monitor the NDHCB. This model is designed to empower boards of directors to fulfill their obligation of accountability for the organizations they govern through focused evaluation of accomplishments. Examples of this Model include: timelines for NDHCB Executive Director to report to the CDHO representative who sits as a Governor on NDHCB with detailed reports, reporting content is quite specific and includes items such as: access to exams and requests for accommodation.</i></p> <ul style="list-style-type: none"> <i>The National Dental Hygiene Certification Board (NDHCB) has documents available to assist all candidates prepare for its examination. These include an examination blueprint and a guide for all candidates for the examination.</i> <i>The NDHCB has also developed a 75-item preparatory test available to examination candidates.</i> <p><i>Also, the CDHO provides the following information regarding its third parties process: The NDHCB evaluation process is based on current accreditation standards, which are updated regularly. The NDHCB Exam is a standardized multiple choice written exam that tests the candidate's ability to apply knowledge and answer questions related to dental hygiene practice. The content of this exam is based on dental hygiene competencies. The competencies, guidelines and specifications that outline the way these should be measured on the exam, are outlined in the NDHCB Blueprint for the NDHCB Exam. The standard for the examination is established by using the accepted and widely used modified Angoff method and/or Statistical Equating. The Examination Approval Subject Matter Experts will set the specific passing score for each version of the NDHCB using that method. The exam is computer scored by the testing agency contracted by the NDHCB. To confirm that the examination meets or exceeds professional standards, a comprehensive statistical analysis is used on the exam. Items that do not meet these criteria are not used in calculating candidates' scores. An Examinations Committee meets annually to set the examination for the following year. Item writing workshops are held to develop new questions for the dental hygiene item bank. The new items are sent to teams of nine dental hygiene educators across Canada who either reject the item or accept it. At each clinical evaluation (for those coming from an unaccredited dental hygiene program), the Chief Evaluator conducts a calibration exercise with the evaluator. If the members of the evaluation team of two do not agree on the candidate's result, then the Chief Evaluator will conduct a third assessment. At the conclusion of the session, a debriefing occurs and improvements are made to the system where required, any new components of the evaluation are posted on the website.</i></p>		

5. SPECIFIC DUTY- ASSESSMENT OF QUALIFICATIONS		
14. Good: Applicants can have their qualifications assessed while outside Canada. [Fairness]	Y	CDHO website, Annual Meeting
<p><i>Comments: According to the CDHO Career map applicants can complete and submit their application overseas. CDHO will accept and process applications from overseas (if the documents are in a language other than English or French, official translations from overseas will be accepted). The NDHCB requires an external educational credential evaluation from applicants who graduated outside of Canada or the US, through WES and can be completed online. The Jurisprudence Education Module can also be completed online from outside of Canada.</i></p>		

6. SPECIFIC DUTY- TRAINING

Legislation: RHPA, Schedule 2, s. 22.4(3)

22.4(3) The College shall ensure that individuals assessing qualifications and making registration decisions or reviewing decisions have received training that includes, where appropriate,

(a) training on how to assess such qualifications and make such decisions;

(b) training in any special considerations that may apply in the assessment of applications and the process for applying those considerations.

DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment	Information Source
<p>1. Required: The regulatory body ensures that training is provided for individuals who:</p> <ul style="list-style-type: none"> • assess qualifications • make registration decisions • make internal review and appeal decisions 	Y	FRP Report 2010 Section 10a and Audit Report C7a, p.150
	Y	FRP Report 2010 Section 10a and Audit Report C7a, p. 150
	Y	FRP Report 2010 Section 10a and Audit Report C7a, p. 150
<p><i>Comments: Annual training is provided for decision makers, which addresses the following; criteria used in determining whether the applicant meets the requirements for registration, the methodology of conducting assessments and issues related to making registration decisions. All Registration Committee members are provided with an opportunity to attend a Fair Registration Practices and Procedures seminar, including application of special considerations. Legal counsel has been invited to meet with the Registration Committee to address specific issues.</i></p>		
<p>2. Required: Where appropriate, training includes the following:</p> <ul style="list-style-type: none"> • training on how to assess qualifications and make registration and review decisions • training in any special considerations that may apply in the assessment of applicants and the process for 	Y	FRP Report 2010 Section 10a and Audit

6. SPECIFIC DUTY- TRAINING		
applying those considerations Examples of special considerations include the following: acceptable alternatives to required documentation, and policies regarding accommodation of special needs.		Report C7a
	Y	FRP Report 2010 Section 10a and Audit Report C7a and c, pp.150-158
<i>Comments: Special considerations training is outlined in the Audit Report 2009, the training in special considerations occurs by a) sending members of the committee to offsite training b) inviting legal counsel to attend training regarding special considerations c) appointing educators to the Registration Committee.</i>		
3. Good: The individuals covered by item 1 receive: <ul style="list-style-type: none"> • initial training (as soon as they have been assigned their duties) • ongoing training (whenever there is a change in regulations, policies or procedures) 	Y	FRP Report 2010 Section 10a and Audit Report C7a,b and c, pp.150-158
	Y	FRP Report 2010 Section 10a and Audit Report C7a, b and c, pp.150-158
<i>Comments: Annual training for decision makers addresses criteria used by the Registration Committee in determining whether the applicant meets the requirements for registration, the methodology of conducting assessments and issues related to making registration decisions. All Committee members are provided with an opportunity to attend a Fair Registration Practices and Procedures seminar and in special consideration, legal counsel has been invited to meet with the Registration Committee to address specific issues.</i>		
4. Good: All staff members who deal with applications have training in the following: <ul style="list-style-type: none"> • anti-discrimination • cultural diversity • the objectives of Schedule 2 to the Health Professions Procedural Code of the RHPA 	OI	FRP Report 2010 Section 10a and Audit Report C7a, b and c, pp.150-158, Annual

6. SPECIFIC DUTY- TRAINING		
		Meeting
	Y	FRP Report 2010 Section 10a and Audit Report C7a, b and c, pp.150-158, Annual Meeting
	Y	FRP Report 2010 Section 10a and Audit Report C7a, b and c, pp.150-158, Annual Meeting
<p><i>Comments: The CDHO advises that all staff and Registration Committee members attend:</i></p> <ul style="list-style-type: none"> • <i>Orientation session which includes the legislation and Registration Committee processes.</i> • <i>Managing cultural differences presentation by ORAC</i> • <i>Fair Registration Practices presentation by legal counsel</i> <p><i>The CDHO does not provide anti-discrimination training to its staff or Registration Committee members. OFC recommends that the CDHO consider including anti-discrimination training, perhaps as part of its orientation training. The anti-discrimination training could be combined with training on other topics such as human rights, Accessibility for Ontarians with Disabilities Act and the anti-harassment provisions in the Occupational Health and Safety Act.</i></p>		

7. SPECIFIC DUTY- ACCESS TO RECORDS

Legislation: RHPA, Schedule 2, s. 16

16(1) The Registrar shall give an applicant for registration, at his or her request, all the information and a copy of each document the College has that is relevant to the application.

Exception

(2) The Registrar may refuse to give an applicant anything that may, in the Registrar’s opinion, jeopardize the safety of any person.

DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING REQUIRED AND GOOD PRACTICES?	Assessment	Information Source
<p>1. Required: Subject to limitations indicated in legislation, applicants have access to their records. Records include all the documents that relate to the application.</p> <p>Documents may include the following, for example: documents provided by the applicant; documents that describe the regulatory body’s rationale for its decision; documents related to an applicant’s assessment of qualifications, such as exam results or credential assessment results; and documents related to accommodation requests, review requests, and appeals.</p>	Y	<p>FRP Report 2010 Section 4a, Audit Report 2009 C8a p. 165</p>
<p><i>Comments: Very few requests (last one in 2009) granted typically the same day.</i></p>		
<p>2. Good: The regulatory body communicates the following to applicants:</p> <ul style="list-style-type: none"> • the way that an applicant can ask for records (for example, in person, by email, or by completing and submitting a written form) • the way in which records are available (for example, by photocopy, by access in person) • who may access the records • how long the records are kept • what limitations (if any) exist on the right to access the records 	Y	<p>FRP Report 2010 Section 4a-b, Audit Report 2009 C8d p.171 Annual Meeting</p>
	Y	<p>FRP Report 2010 Section 4a-b, Audit Report 2009 C8d p. 171 Annual Meeting</p>

7. SPECIFIC DUTY- ACCESS TO RECORDS		
	Y	FRP Report 2010 Section 4a-b, Audit Report 2009 C8dp. 171 Annual Meeting
	OI	FRP Report 2010 Section 4a-b, Audit Report 2009 C8d p. 171, Annual Meeting
	N/A	FRP Report 2010 Section 4a-b, Audit Report 2009 C8d p.171, Annual Meeting
<p><i>Comments: The CDHO acknowledges that it communicates how applicants can access their records, the process for and any limitations on records access. It does not provide the retention period. CDHO advises that the applicant's records are kept for one year, under their retention schedule. However, there are certain cases that certain records maybe be kept longer depending on whether the documentation was more challenging to obtain (e.g., credentials/transcripts from outside of Canada or from a College that is not longer operational.) The CDHO acknowledges that this information is not available on its website. The OFC recommends that the CDHO state, in the Registration area of its website and on its registration checklist, its policy for retaining (and not returning) applicants' registration application documents.</i></p>		
3. Good: If there is a fee for making records available, the regulatory body gives applicants an estimate of this fee. The amount of the fee does not exceed the amount of reasonable cost recovery.	N/A	FRP Report 2010 Section 4c-d, Audit Report C8e-f

7. SPECIFIC DUTY- ACCESS TO RECORDS		
		pp.173-175
<i>Comments: No fee for this.</i>		
4. Good: When requested, access to records is granted as soon as possible, within a maximum of 30 days.	Y	FRP Report 2010 Section 4a, Audit Report 2009 C8 pp.165-175
<i>Comments: There are very few requests from applicants to access their application file as most for the information is submitted by the applicant. The last request was in 2009 and the request was granted the same day.</i>		

8. GENERAL DUTY		
Legislation: RHPA, Schedule 2, s.22.2		
22.2 The College has a duty to provide registration practices that are transparent, objective, impartial and fair.		
DOES THE REGULATORY BODY DEMONSTRATE THE FOLLOWING PRACTICES?	Assessment (Y/N/OI/ NA/TBD)	Information Source
TRANSPARENCY		
1. Registration policies and criteria are well-documented. They are easy to find; they are described in a direct way; their meaning is readily apparent; they are well-defined and unambiguous. There are no unwritten policies. <i>Comments: The CDHO's registration information and registration process are clearly documented and easy to find.</i>	Y	CDHO and NDHCB websites, FRP Report 2010
2. Good: Regulatory bodies communicate well with applicants about their application. Applicants know how their applications are progressing. Decisions and the reasons for them are communicated clearly. Applicants can see that the stated policies have been followed in their case. <i>Comments: Once the registration requirements have been met and the College has received a completed application form, the registration processing time is approximately 5-10 business days. Applicants are usually responded to between 3-5 business days if they have a question. With an incomplete package, the applicant is contacted in 3-5 business days. As indicated in "A Guide to the Process of Being Registered as a Dental Hygienist in Ontario", it takes approximately three months for a course of study to be assessed. In the "College of Dental Hygienists of Ontario Clinical Competency Evaluation Information to Candidates" guide, results will be forwarded to candidates within three weeks of the evaluation.</i>	Y	CDHO and NDHCB websites, FRP Report 2010 Section 1j, OFC file, HPARB decisions, Audit Report 2009 C1b pp.19-20.
OBJECTIVITY		
1. Good: Criteria can be measured by using verifiable data, without requiring a subjective assessment that applies personal views or judgments. <i>For example, well-crafted marking templates or multiple-choice questions may be used to help make the grading of exams a more objective exercise; good character requirements may be measured against concrete criteria such as the lack of a criminal record, or the completion of a standard template for references.</i>	Y	CDHO and NDHCB websites, FRP Report 2010 Section 8a, 1c, 9 Audit Report C6a.
<i>Comments: See Comment for Specific Duty 5.3. The CDHO and the NDHCB rely on objective measures to consistently determine whether applicants meet the CDHO's registration criteria. For example, the NDHCB exam must be written by all applicants, and it uses multiple-choice questions that can be graded consistently for all applicants. The exam blueprint shows the relationship between the assessment criteria and the competencies (skills and knowledge) needed to practice the profession. Like the NDHCB exam, the Jurisprudence Education Module is required for all applicants and uses multiple-choice questions.</i>		

8. GENERAL DUTY		
2. Decision makers can determine whether the criteria have been met or not in a straightforward way; different decision-makers reach consistent decisions.	Y	CDHO and NDHCB websites, FRP Report 2010 Section 8a, 1c, Audit Report C6a. Annual meeting
<i>Comments: Examples include fulsome objective criteria (third party exams), training for Registration Committee and reviewing previous decisions to ensure consistency. In the equivalency process used internally, each member of the Registration Committee panel is provided with a chart of competencies/criteria which they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision.</i>		
IMPARTIALITY		
1. Good: Registration decisions are made free from bias and preconceived notions about any individual or group of individuals.	Y	CDHO and NDHCB websites, FRP Report 2010 Section 8a-b, 1c, 9, 10, Audit Report C6a. Annual Meeting
<i>Comments: Examples include fulsome objective criteria (third party exams), training for Registration Committee and reviewing previous decisions to ensure consistency. In the equivalency process used internally, each member of the Registration Committee panel is provided with a chart of competencies/criteria which they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision.</i>		
2. Good: Decision-makers come to each case without a preconceived view about the merits of the application. They maintain an open mind as they review the evidence to determine whether the applicant meets the criteria.	Y	CDHO and NDHCB websites, FRP Report 2010 Section 8a-b, 1c, 9, 10, Audit Report C6a. Annual Meeting
<i>Comments: Examples include fulsome objective criteria (third party exams), training for Registration Committee and reviewing previous decisions to ensure consistency. In the equivalency process used internally, each member of the Registration Committee panel is provided with a chart of competencies/criteria which they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision.</i>		
3. Good: Decision-makers do not undervalue applicants from certain jurisdictions or give undue preference to those from other jurisdictions, because the decision-makers are well trained in applying assessment criteria.	Y	CDHO and NDHCB websites, FRP Report 2010 Section 8a-b, 1c, 9, 10, Audit Report C6a. Annual Meeting
<i>Comments: Examples include fulsome objective criteria (third party exams), training for Registration Committee and reviewing previous decisions to ensure consistency. In the equivalency process used internally, each member of the Registration Committee panel is provided with a chart of competencies/criteria which they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision.</i>		

8. GENERAL DUTY		
<i>they are each required to complete individually with concrete information derived from the applicant's documentation. Subsequently the panel will go over their individual findings together to come to a decision.</i>		
4. Good: Assessors, decision-makers and any other staff members who deal with registration applications are free from real or perceived conflicts of interest. ⁴	Y	CDHO and NDHCB websites, FRP Report 2010 Section 6, 8a-b, 1c, 9, 10, Audit Report C6a. Annual Meeting
<i>Comments: According to the FRP Report 2010 administration reviews panels past involvement to ensure no conflict of interest in decision-making. At each meeting, Registration Committee members must declare a conflict of interest.</i>		
FAIRNESS		
1. Good: Registration decisions adhere to published criteria, standards and policies.	Y	CDHO and NDHCB websites, FRP Report 2010
<i>Comments: See comments for Specific Duty 5.13</i>		
2. Good: Applicants are treated in a way that takes their circumstances into consideration (reasonable accommodation) to achieve an equitable result. <i>For example, insisting that all applicants provide original documents treats everyone the same but may not be fair where records are not obtainable, and where alternative methods exist to prove the credential or competency.</i>	Y	CDHO and NDHCB websites, FRP Report 2010 Section 1e, h.
<i>Comments: Alternative methods exist on a case by case basis. Accommodation policies and processes are in place for those who make request for accommodations (e.g., for examinations).</i>		
3. Good: Registration fees are reasonable. The regulatory body can show how fees under its control are set and can provide the rationale for the amounts. Fees are not unjustifiably higher than the cost of providing the service.	Y	ETP Review Report 2010 Review of fees
<i>Comments: Current fees were assessed in ETP Review Report 2010 as reasonable and recommended no changes to the fees at this time. Fees are set on a cost recovery basis and in comparison to other provincial dental hygiene bodies, CDHO fees were at the lower end of the scale.</i>		
4. Good: The regulatory body is able to explain how all requirements emerged and why they are necessary and relevant to the practice of the profession.	Y	CDHO and NDHCB websites, FRP Report 2010 Section 8-9
<i>Comments: In materials referenced the CDHO and NDHCB directly link assessment to core competencies, standards and guidelines. For detailed information see comments for Specific Duty 5.1.and 5.13</i>		

⁴ A conflict of interest includes, for example, any situation or circumstance in which the person's other commitments, relationships or financial interests:

- could improperly influence the person's objective, unbiased and impartial exercise of his or her independent judgment, or could be perceived as doing so; or
- could compromise, impair or be incompatible with the person's effective performance of his or her contractual obligations, or could be perceived as doing so.

8. GENERAL DUTY		
5. Good: Requirements do not unjustifiably exclude or limit certain groups, such as internationally trained applicants.	Y	ETP Review Report 2010, CDHO and NDHCB websites, FRP Report 2010 Section 8-9
<i>Comments: The OFC has found that most of the CDHO application processing and registration requirements can be completed overseas. The CDHO has no work experience requirements. Work experience is not considered in the clinical competency evaluation. The clinical evaluators do not know if the candidate is a new graduate or an experienced clinician.</i>		
6. Good: The regulatory body can clearly justify the Canadian or Ontario experience it claims is necessary for applicants to become familiar with the specifics of practice in Ontario.	N/A	ETP Review Report 2010, CDHO and NDHCB websites, FRP Report 2010 Section 8-9
<i>Comments: No work experience required.</i>		
7. Good: The regulatory body can explain how international experience alone is insufficient to meet the objectives of the regulatory body's workplace or clinical experience requirement.	N/A	ETP Review Report 2010, CDHO and NDHCB websites, FRP Report 2010 Section 8-9
<i>Comments: No work experience required.</i>		
8. The registration process is streamlined and unnecessary steps are eliminated.	Y	FRP Report 2010 Section 1 and 8, Audit Report 2010 D3 p.197
<i>Comments: The Audit Report found that based on its evaluation the CDHO processes are streamlined. Other examples include:</i> <ul style="list-style-type: none"> • <i>Most of the registration requirements can be completed online.</i> • <i>NDHCB accepts external evaluation of education requirements such as WES evaluation.</i> • <i>Steps are outlined for each type of applicant online based on the requirements for each (e.g., accredited, or non-accredited, other Canadian jurisdiction, internationally trained).</i> 		
9. Good: The regulatory body ensures that the following are done within a reasonable amount of time: <ul style="list-style-type: none"> • making registration decisions; giving the decisions (in writing) to applicants; and giving reasons, where applicable • making decisions about internal reviews and appeals; giving the decisions (in writing) to applicants; and giving reasons, where applicable responding to applicants' inquiries or requests	Y	FRP Report 2010 Section 3a-b 1m-n, Audit Report D3 p. 197, ETP Review Report 2010, CDHO and NDHCB websites
<i>Comments: The CDHO evaluated its timeliness through the ETP Review Report and determined its timelines for decisions were reasonable. Other measures it takes are to randomly select 10 new registrants application files every six months to ensure that published timelines have been met; this process will also include all applicants who were referred to the Registration Committee. Typically, applications are processed within 10 business days; if the applicant is referred to the</i>		

8. GENERAL DUTY

Registration Committee then the applicant is notified of this within 10 business days. If there is a decision regarding the assessment of a course of study, a decision is typically rendered in three months. If the decision is regarding a declaration on an application, once all the required documents have been received, is finalized within two to four weeks.

SUMMARY OF ASSESSMENT OF REGISTRATION PRACTICES AND RECOMMENDATIONS:

A) Commendable Practices

Specific Duty – Information for Applicants

- *The CDHO's website is the main vehicle that the CDHO uses to communicate with its applicants. The website provides extensive information about the registration process. Some of this information is translated into French. Information about proposed changes to the CDHO's registration regulation (O. Reg. 218/94) is clear and tells applicants how this regulation will affect registration.*
- *Applicants can complete most steps in the registration process outside of Canada.*
- *Information that is specifically for international graduates is complete, clear, and easy to find on the CDHO website.*
- *The CDHO identifies the requirements that may be satisfied through acceptable alternatives and describes the process involved.*

Specific Duty – Documentation of Qualifications

- *The CDHO identifies the documents that applicants (including international applicants and graduates from non-accredited programs) must submit with their applications. This information is available through multiple access points on the CDHO website.*

Specific Duty – Assessment of Qualifications

- *The CDHO provides a significant amount of information about the assessment of qualifications, including information about and resources for its Jurisprudence Education Module. It also provides information about the educational and exam requirements of the CDHO's qualifications assessment agencies.*
- *The National Dental Hygiene Certification Board (NDHCB), one of the CDHO's qualifications assessment agencies, uses standardized multiple-choice methods for its exam and develops the exam in accordance with national competencies (the knowledge, skills and training that are needed to practise the profession across Canada).*

General Duty – Transparency

- *The CDHO's registration information and registration process are clearly documented and easy to find.*

General Duty – Objectivity

- *The CDHO and the NDHCB rely on objective measures to consistently determine whether applicants meet the CDHO's registration criteria. For example, the NDHCB exam must be written by all applicants, and it uses multiple-choice questions that can be graded consistently for all applicants. The exam blueprint shows the relationship between the assessment criteria and the competencies (skills and knowledge) needed to practise the profession. Like the NDHCB exam, the Jurisprudence Education Module is required for all applicants and uses multiple-choice questions.*

A) Recommendations

Specific Duty –Information for Applicants

- *The CDHO specifies that language proficiency is determined by the applicant's ability to successfully complete the examinations in either French or English, but this information is difficult to find on the CDHO website. The OFC recommends that the CDHO provide this information in the International Programs section and in the Graduate Requirements section, in all places where the language proficiency requirement is stated. (Good Practice: 1.5)*
- *The CDHO will add “good character” to its registration regulation. The OFC recommends that the CDHO:*
 - *Describe “good character” clearly on its website.*
 - *Use objective measures to identify whether an applicant meets this requirement (for example, a police record check). (Good Practice: 1.6)*
- *The OFC recommends that the CDHO state, in the Registration area of its website and on its registration checklist, its policy for retaining (and not returning) applicants' registration application documents. (Good Practice: 1.12; also Good Practice: 7.2)*
- *Timelines for the registration process can vary. (For example, after successfully completing the NDHCB exam, applicants who are graduates of accredited programs can become registered in as little as 10 business days. But graduates of Non-Accredited Programs must also successfully complete a provincial clinical competency assessment, which typically adds six-to-eight months to the registration process.) The different timelines for each stage of the application are not clearly described on the website or in other information for applicants. The OFC recommends that the CDHO provide additional clarification (similar to information provided in the CDHO's Fair Registration Practices (FRP) Report 2010 or its Audit Report) about the various estimated times for each stage of the application. (Good Practice: 1.14)*
- *The OFC recommends that the CDHO provide a direct link in the Registration section of its website to the fee information for the NDHCB exam. (Good Practice: 1.16)*

Specific Duty – Documentation of Qualifications

- *The OFC recommends that the CDHO inform its applicants about the process for dealing with missing and incomplete documentation, either by putting this information in the Registration section of the website or by including it in the checklist document. (Good Practice: 4.3)*

Specific Duty-Assessment of Qualifications

- *The CDHO's registration committee panel uses a list of criteria/competencies to make a decision about an application from a graduate of a non-accredited program. The OFC recommends that these criteria/competencies be posted on the CDHO website in the Registration section (in the Non-Accredited Programs area).(Required Practice: 5.3 and 5.4)*
- *The OFC recommends that the CDHO include information on its website regarding the measures the CDHO takes to ensure objectivity, validity and reliability of the Jurisprudence Education Module, clinical competency evaluation and the educational/equivalency assessments. (Required Practice 5.4)*

Specific Duty- Training

- *The CDHO does not provide anti-discrimination training to its staff or its registration committee members. The OFC recommends that the CDHO consider including anti-discrimination training, perhaps as part of its orientation training. The anti-discrimination training could be combined with training on other topics such as human rights, the Accessibility for Ontarians with Disabilities Act, and the anti-harassment provisions in the Occupational Health and Safety Act. (Good Practice: 6.4)*

TEXT OF RHPA RELATING TO INTERNAL “REVIEW” AND INFORMATION ON APPEAL RIGHTS

Internal “review”: RHPA, Schedule 2, s.15, s.18, s.19

Registration

15. (1) If a person applies to the Registrar for registration, the Registrar shall,
- (a) register the applicant; or
 - (b) refer the application to the Registration Committee. 1991, c. 18, Sched. 2, s. 15 (1).

Referrals to Registration Committee

- (2) The Registrar shall refer an application for registration to the Registration Committee if the Registrar,
- (a) has doubts, on reasonable grounds, about whether the applicant fulfils the registration requirements;
 - (a.1) is of the opinion that terms, conditions or limitations should be imposed on a certificate of registration of the applicant and the applicant is an individual described in subsection 22.18 (1);
 - (b) is of the opinion that terms, conditions or limitations should be imposed on a certificate of registration of the applicant and the applicant does not consent to the imposition; or
 - (c) proposes to refuse the application. 1991, c. 18, Sched. 2, s. 15 (2); 1993, c. 37, s. 6; 2009, c. 24, s. 33 (3).

Notice to applicant

(3) If the Registrar refers an application to the Registration Committee, he or she shall give the applicant notice of the statutory grounds for the referral and of the applicant’s right to make written submissions under subsection 18 (1). 1991, c. 18, Sched. 2, s. 15 (3).

Terms, etc., attached on consent

(4) If the Registrar is of the opinion that a certificate of registration should be issued to an applicant with terms, conditions or limitations imposed and the applicant consents to the imposition, the Registrar may do so with the approval of a panel of the Registration Committee selected by the chair for the purpose. 1991, c. 18, Sched. 2, s. 15 (4).

Panels for consent

- (5) Subsections 17 (2) and (3) apply with respect to the panel mentioned in subsection (4). 1991, c. 18, Sched. 2, s. 15 (5).

Consideration by panel

18. (1) An applicant may make written submissions to the panel within thirty days after receiving notice under subsection 15 (3) or within any longer period the Registrar may specify in the notice.

Orders by panel

- (2) After considering the application and the submissions, the panel may make an order doing any one or more of the following:
1. Directing the Registrar to issue a certificate of registration.
 2. Directing the Registrar to issue a certificate of registration if the applicant successfully completes examinations set or approved by the panel.
 3. Directing the Registrar to issue a certificate of registration if the applicant successfully completes additional training specified by the panel.
 4. Directing the Registrar to impose specified terms, conditions and limitations on a certificate of registration of the applicant and specifying a limitation on the applicant's right to apply under subsection 19 (1).
 5. Directing the Registrar to refuse to issue a certificate of registration.

Idem

(3) A panel, in making an order under subsection (2), may direct the Registrar to issue a certificate of registration to an applicant who does not meet a registration requirement unless the requirement is prescribed as a non-exemptible requirement.

Order on consent

(4) The panel may, with the consent of the applicant, direct the Registrar to issue a certificate of registration with the terms, conditions and limitations specified by the panel imposed. 1991, c. 18, Sched. 2, s. 18.

Application for variation

19. (1) A member may apply to the Registration Committee for an order directing the Registrar to remove or modify any term, condition or limitation imposed on the member's certificate of registration as a result of a registration proceeding. 1991, c. 18, Sched. 2, s. 19 (1).

Limitations

(2) The right to apply under subsection (1) is subject to any limitation in the order imposing the term, condition or limitation or to which the member consented and to any limitation made under subsection (7) in the disposition of a previous application under this section. 1991, c. 18, Sched. 2, s. 19 (2).

Panels

(3) An application to the Registration Committee under subsection (1) or an application referred back to the Registration Committee by the Board shall be considered by a panel selected by the chair from among the members of the Committee. 1991, c. 18, Sched. 2, s. 19 (3); 2007, c. 10, Sched. M, s. 25 (1).

Idem

(4) Subsections 17 (2) and (3) apply with respect to the panel mentioned in subsection (3). 1991, c. 18, Sched. 2, s. 19 (4).

Submissions

(5) An applicant may make written submissions to the panel. 1991, c. 18, Sched. 2, s. 19 (5).

Orders

(6) After considering the application and the submissions, the panel may make an order doing any one or more of the following:

1. Refusing the application.
2. Directing the Registrar to remove any term, condition or limitation imposed on the certificate of registration.
3. Directing the Registrar to modify terms, conditions or limitations on the certificate of registration. 1991, c. 18, Sched. 2, s. 19 (6); 2007, c. 10, Sched. M, s. 25 (2).

Limitations on applications

(7) When an application has been disposed of under this section, the applicant may not make a new application under subsection (1) within six months of the disposition without leave of the Registrar. 2007, c. 10, Sched. M, s. 25 (3).

Registrar's leave

(8) The Registrar may only give leave for a new application to be made under subsection (7) if the Registrar is satisfied that there has been a material change in circumstances that justifies the giving of the leave. 2007, c. 10, Sched. M, s. 25 (3).

Registration hearings or reviews

22. (1) This section applies to a hearing or review by the Board required by an applicant under subsection 21 (1). 1991, c. 18, Sched. 2, s. 22 (1).

Procedural provisions

(2) The following provisions apply with necessary modifications to a hearing or review:

1. Subsection 38 (4) (exclusion from panel).
2. Section 42 (disclosure of evidence).
3. Section 43 (no communication by panel members).
4. Section 50 (members of panel who participate).
5. Section 55 (release of evidence). 1991, c. 18, Sched. 2, s. 22 (2).

Information on appeal rights: RHPA, Schedule 2, s. 20, s. 21, s.22, s. 22.2

Notice of orders

- 20.** (1) A panel shall give the applicant notice of an order it makes under subsection 18 (2) or 19 (6) and written reasons for it if the order,
- (a) directs the Registrar to refuse to issue a certificate of registration;
 - (b) directs the Registrar to issue a certificate of registration if the applicant successfully completes examinations or additional training;
 - (c) directs the Registrar to impose terms, conditions and limitations on a certificate of registration of the applicant; or
 - (d) refuses an application for an order removing or modifying any term, condition or limitation imposed on a certificate of registration. 1991, c. 18, Sched. 2, s. 20 (1).

Contents of notice

(2) A notice under subsection (1) shall inform the applicant of the order and of the provisions of section 19 and of subsections 21 (1) and (2). 1991, c. 18, Sched. 2, s. 20 (2); 2007, c. 10, Sched. M, s. 26.

Appeal to Board

21. (1) An applicant who has been given a notice under subsection 20 (1) of an order may require the Board to hold a review of the application and the documentary evidence in support of it, or a hearing of the application, by giving the Board and the Registration Committee notice in accordance with subsection (2).

Requirements of notice

(2) A notice under subsection (1) shall be a written notice, given within thirty days after the notice under subsection 20 (1) was given, specifying whether a review or a hearing is required.

Order, etc., to Board

(3) If the Registration Committee receives a notice that an applicant requires a hearing or review, it shall, within fifteen days after receiving the notice, give the Board a copy of the order made with respect to the application, the reasons for it and the documents and things upon which the decision to make the order was based.

When order may be carried out

- (4) An order of a panel, notice of which is required under subsection 20 (1), may be carried out only when,
- (a) the applicant has given the Registrar notice that the applicant will not be requiring a review or hearing;
 - (b) thirty-five days have passed since the notice of the order was given under subsection 20 (1) without the applicant requiring a review or hearing; or
 - (c) the Board has confirmed the order. 1991, c. 18, Sched. 2, s. 21.

Registration hearings or reviews

22. (1) This section applies to a hearing or review by the Board required by an applicant under subsection 21 (1). 1991, c. 18, Sched. 2, s. 22 (1).

Procedural provisions

(2) The following provisions apply with necessary modifications to a hearing or review:

1. Subsection 38 (4) (exclusion from panel).
2. Section 42 (disclosure of evidence).
3. Section 43 (no communication by panel members).
4. Section 50 (members of panel who participate).
5. Section 55 (release of evidence). 1991, c. 18, Sched. 2, s. 22 (2).

Idem

(3) The following provisions also apply with necessary modifications to a hearing:

1. Section 45 (hearings open).
2. Section 47 (sexual misconduct witnesses).
3. Section 48 (transcript of hearings). 1991, c. 18, Sched. 2, s. 22 (3).

Same

(3.1) The following provisions of the *Statutory Powers Procedure Act* also apply with necessary modifications to a review by the Board:

1. Section 21.1 (correction of errors).
2. Section 25.1 (rules). 1998, c. 18, Sched. G, s. 12.

Findings of fact

(4) The findings of fact in a hearing shall be based exclusively on evidence admissible or matters that may be noticed under sections 15, 15.1, 15.2 and 16 of the *Statutory Powers Procedure Act*. 1991, c. 18, Sched. 2, s. 22 (4); 2007, c. 10, Sched. M, s. 27 (1).

Idem

(5) The findings of fact in a review shall be based exclusively on the application and documentary evidence admissible or matters that may be noticed under sections 15, 15.1, 15.2 and 16 of the *Statutory Powers Procedure Act*. 1991, c. 18, Sched. 2, s. 22 (5); 2007, c. 10, Sched. M, s. 27 (2).

Disposal by Board

(6) The Board shall, after the hearing or review, make an order doing any one or more of the following:

1. Confirming the order made by the panel.

2. Requiring the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant if the applicant successfully completes any examinations or training the Registration Committee may specify.
3. Requiring the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant and to impose any terms, conditions and limitations the Board considers appropriate.
4. Referring the matter back to the Registration Committee for further consideration by a panel, together with any reasons and recommendations the Board considers appropriate. 1991, c. 18, Sched. 2, s. 22 (6); 2007, c. 10, Sched. M, s. 27 (3).

Idem

(7) The Board may make an order under paragraph 3 of subsection (6) only if the Board finds that the applicant substantially qualifies for registration and that the panel has exercised its powers improperly. 1991, c. 18, Sched. 2, s. 22 (7).

Limitation on order

(8) The Board, in making an order under subsection (6), shall not require the Registration Committee to direct the Registrar to issue a certificate of registration to an applicant who does not meet a registration requirement that is prescribed as a non-exemptible requirement. 1991, c. 18, Sched. 2, s. 22 (8).

Parties

(9) The College and the applicant are parties to a hearing or review. 1991, c. 18, Sched. 2, s. 22 (9).