



REGISTRATION PRACTICES ASSESSMENT REPORT

College of Dental Hygienists of Ontario

2018 Assessment

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The Office of the Fairness Commissioner is an agency of the Ontario government, established under the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006*. Its mandate is to ensure that certain regulated professions have registration practices that are transparent, objective, impartial and fair.

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AVAILABILITY OF REPORT

This report is provided by the OFC to the regulatory body assessed. The OFC will, upon request, release the report to other parties. The OFC will also post the report on its website. In the interest of transparency and accountability, the OFC encourages regulatory bodies to provide the report to its staff, council members, the public, and other interested parties.

Introduction

This report contains an assessment of registration practices of the College of Dental Hygienists of Ontario.

Assessment is one of the Fairness Commissioner's mandated roles under the [Fair Access to Regulated Professions and Compulsory Trades Act, 2006 \(FARPACTA\)](#) and the [Regulated Health Professions Act, 1991 \(RHPA\)](#) – collectively known as fair access legislation.

Assessment Cycle

One of the primary ways the OFC holds regulators accountable for continuous improvement is through the assessment of registration practices using a [three -year assessment cycle](#).

Assessment cycles alternate between **full assessments** and **targeted assessments**:

- Full assessments address all specific and general duties described in the fair-access legislation.
- Targeted assessments focus on the areas where the OFC made recommendations in the previous full assessment.

In this assessment cycle, certain practices related to provision of information are excluded as the College has previously been assessed in these areas.¹ In most cases, regulators that have previously been assessed have demonstrated compliance with these practices and will only be assessed should substantive changes arise in policies or practices.

Assessment Summary

The Office found the College in compliance with the OFC's fair registration practice standards, and has not made any recommendations in this assessment cycle.

Specific Duties

Specific duties assessed

The regulator has been assessed on all of the specific duties identified in Schedule 2 of the *Regulated Health Professions Act*.

Comments

¹ These includes: all practices from Information for Applicants, practice 3 from Internal Review and Appeals, practice 1 from Information on Appeal Rights, practice 1 from Documentation of Qualifications, practice 1 from Assessment of Qualifications, practice 2 from Access to Records, and practices 4-11 from Transparency of the Registration Practices Assessment Guide.

The regulatory body has demonstrated compliance with all of the practices in the following specific-duty areas:

- Information for Applicants
- Timely Decisions, Responses and Reasons
- Internal Review or Appeal
- Information on Appeal Rights
- Documentation
- Assessment of Qualifications
- Training
- Access to Records

General Duty

Assessment Method

- a. OFC practice-based assessment (following the practices in the Assessment Guide)
- b. Regulator practice-based self-assessment (following the practices in the Assessment Guide)
- c. Regulator systems-based self-assessment (in which it explains systemically and holistically how it meets the general duty)

Principles assessed

The regulator has demonstrated compliance with all of the general duty principles: transparency, objectivity, impartiality and fairness.

Commendable Practices

A *commendable practice* is a program, activity or strategy that goes beyond the minimum standards set by the OFC assessment guides, considering the regulatory body's resources and profession-specific context. Commendable practices may or may not have potential for transferability to another regulatory body.

The regulatory body is demonstrating commendable practices in the following areas:

Specific Duty:

None

General Duty:

Transparency

1. The College's participation in the multi-stakeholder Citizen Advisory Group demonstrates a high level of commitment to public input in the College's governance processes.

Objectivity

1. The College reviewed and redesigned the method of assessing educational program equivalence for applicants that graduated from non-accredited programs, to ensure that the process and criteria meet current program standards.
2. The College runs an internal random audit of our new registration files twice a year to verify that the files contain the required information, that data entry is complete and that the timelines in processing were met.

Fairness

1. The College's jurisprudence self-study guide is designed to prepare applicants for the jurisprudence exam, by providing information about the laws, regulations, bylaws, practice standards and guidelines that govern the dental hygiene profession in Ontario.

Opportunities for Improvement

The OFC has not identified substantive opportunities for Improvement in registration practices in this assessment.

Assessment History

In the previous assessment the OFC identified three recommendations for the regulator, all of which have been implemented.

Detailed Report²

Specific Duty

1. Specific Duty – Information for Applicants

FARPCTA s. 7

RHPA, Schedule 2, s. 22.3

Exempted as previously assessed.

1. Specific Duty — Timely Decisions, Responses and Reasons.

FARPACTA, s. 8 and s. 9 (1)

RHPA, Schedule 2, s.20 (1)

**Only applies to regulatory bodies governed by FARPACTA*

1. If a regulator rejects an application, it gives written reasons to the applicant. [Fairness, Transparency]

Assessment Outcome	Demonstrated
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2. The regulator makes registration decisions, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome	Not Applicable
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3. The regulator responds to applicants' inquiries or requests without undue delay*. [Fairness]

Assessment Outcome	Not Applicable
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4. The regulator provides internal reviews of decisions, or appeals from decisions, without undue delay*. [Fairness]

² Please note: Suggestions for continuous improvement appear only in the detailed report. Suggestions for improvement are not intended to be recommendations for action to demonstrate a practice, but are made solely to provide suggestions for areas that a regulatory body may consider improving in the future.

Assessment Outcome	Not Applicable
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5. The regulator makes decisions about internal reviews and appeals, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome	Not Applicable
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2. Specific Duty — Internal Review or Appeal

FARPACTA, s. 7, s. 9(2-3, 5)

RHPA, Schedule 2, s. 15, s. 17, s. 19, s. 22.3

*Only applies to regulatory bodies governed by FARPACTA

1. The regulator provides applicants with an internal review of, or appeal from, registration decisions. [Fairness]

Assessment Outcome	Demonstrated
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2. The regulator implements rules and procedures that prevent anyone who acted as a decision-maker in a registration decision from acting as a decision-maker in an internal review or appeal of that same registration decision. [Impartiality]

Assessment Outcome	Demonstrated
Regulator Comments	<i>(Row to be removed during the finalization of the report)</i>

3. The regulator provides information on its website that informs applicants about opportunities for an internal review or appeal.* [Transparency]

Assessment Outcome	Not Applicable
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- 4. The regulator provides information on its website about any limits or conditions on an internal review or appeal.* [Transparency]**

Assessment Outcome	Not Applicable
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4. Specific Duty — Information on Appeal Rights

FARPACTA, s. 9 (4)

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

- 1. On its website, the regulator informs applicants of their right to request further review of, or appeal from, the review or appeal decision. [Transparency]**

Assessment Outcome	Demonstrated
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5. Specific Duty - Documentation of Qualifications

FARPACTA, s. 10 (1)

RHPA, Schedule 2, s. 22.4(1)

- 1. The regulatory body provides information on its website about the documents that must accompany an application to demonstrate qualifications. [Transparency]**

Assessment Outcome	Demonstrated
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6. Specific Duty — Assessment of Qualifications

FARPACTA, s. 10 (2)

RHPA, Schedule 2, s. 22.4(2)

**Only applies to regulatory bodies that develop and administer their own exams.*

1. On its website, the regulator informs applicants about the process, criteria, and policies for the assessment of qualifications. [Transparency]

Assessment Outcome	Demonstrated
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2. The regulator communicates the results of qualifications assessment to each applicant in writing. [Transparency]

Assessment Outcome	Demonstrated
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3. The regulator gives its assessors access to assessment criteria, policies and procedures. [Transparency]

Assessment Outcome	Demonstrated
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4. The regulator shows that its tests and exams measure what they intend to measure.* [Objectivity]

Assessment Outcome	Not Applicable
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5. The regulator states its assessment criteria in ways that enable assessors to interpret them consistently. [Objectivity]

Assessment Outcome	Demonstrated
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6. The regulator ensures that the information about educational programs that is used to develop or update assessment criteria is kept current and accurate. [Objectivity]

Assessment Outcome	Demonstrated
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7. The regulator links its assessment methods to the requirements/standards for entry to the profession or trade. [Objectivity]

Assessment Outcome	Demonstrated
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8. The regulator requires that assessors consistently apply qualifications assessment criteria, policies and procedures to all applicants. [Objectivity]

Assessment Outcome	Demonstrated
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9. The regulator uses only qualified assessors to conduct the assessments. [Objectivity]

Assessment Outcome	Demonstrated
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10. The regulator monitors the consistency and accuracy of decisions, and takes corrective actions as necessary, to safeguard the objectivity of its assessment decisions. [Objectivity]

Assessment Outcome	Demonstrated
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11. The regulator prohibits discrimination and informs assessors about the need to avoid bias in the assessment. [Impartiality]

Assessment Outcome	Demonstrated
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12. The regulator implements procedures to safeguard the impartiality of its assessment methods and procedures. [Impartiality]

Assessment Outcome	Demonstrated
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- 13. The regulator gives applicants an opportunity to appeal the results of a qualifications assessment or to have the results reviewed. [Fairness]**

Assessment Outcome	Demonstrated
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- 14. The regulator assesses qualifications, communicates results to applicants, and provides written reasons for unsuccessful applicants, without undue delay. [Fairness]**

Assessment Outcome	Demonstrated
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- 15. Regulators that rely on third-party assessments establish policies and procedures to hold third-party assessors accountable for ensuring that assessments are transparent, objective, impartial and fair. [Transparency, Objectivity, Impartiality, Fairness]**

Assessment Outcome	Demonstrated
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7. Specific Duty — Training

FARPACTA, s. 11.

RHPA, Schedule 2, s. 22.4(3)

- 1. The regulator provides training for staff and volunteers who assess qualifications or make registration, internal review or appeal decisions. [Objectivity, Impartiality, Fairness]**

Assessment Outcome	Demonstrated
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- 2. The regulator addresses topics of objectivity and impartiality in the training it provides to assessors and decision-makers. [Objectivity, Impartiality]**

Assessment Outcome	Demonstrated
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3. The regulator identifies when new and incumbent staff and volunteers require training and provides the training accordingly. [Objectivity, Impartiality, Fairness]

Assessment Outcome	Demonstrated
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8. Specific Duty — Access to Records

FARPACTA, s. 12

RHPA, Schedule 2, s. 16

1. The regulator provides each applicant with access to his or her application records.

Assessment Outcome	Demonstrated
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2. If there is a fee for making records available, the regulatory body gives applicants an estimate of this fee. [Transparency]

Assessment Outcome	Not Applicable
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3. If there is a fee for making records available, the regulator reviews the fee to ensure that it does not exceed the amount of reasonable cost recovery. [Fairness]

Assessment Outcome	Demonstrated
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General Duty

FARPACTA, Part II, s.6

RHPA, Schedule 2, S.22.2

Transparency

- Maintaining openness
- Providing access to, monitoring, and updating registration information
- Communicating clearly with applicants about their status

Assessment Outcome	<p>The College has implemented policies that demonstrate transparency in assessment processes and practices.</p> <p><u>Openness</u></p> <ul style="list-style-type: none"> • The College is a member of the Citizen Advisory Group partnership. The Citizen Advisory Group was formed originally by the College of Physiotherapists of Ontario to bring the patient’s voice perspective and experiences into discussions about policies, standards of practice and communications directed at the public. There are now twelve partnering Colleges. The Citizen Advisory Group meets twice a year in facilitated, day-long meetings held in Toronto. Colleges may also use this group in between meetings for surveys. • The College’s Ownership Linkage Committee was formed to establish a consultative conduit with the College’s owners, defined as the public, to ensure the public interest is safeguarded in Council processes and policies. The Committee’s goal is to design a consultative agenda that ensure that the College’s policies and objectives are informed by public input. • The College conducts public consultation to seek input from stakeholders on issues related to College governance and registration processes. Consultations are posted to a dedicated page of the College’s website. • An examination blueprint is included in the Registration Examination Resource section of the website that identifies the competencies tested in the exam and their respective weights in the overall marking scheme. <p><u>Access</u></p> <ul style="list-style-type: none"> • The College advises applicants of the progress of their application through a web based user account, including application approval, examination results, and Registration Committee decisions regarding applications and requests for review. • A Professional Practice and Jurisprudence handbook is available to applicants to assist in completion of the Jurisprudence e-learning module. <p><u>Clarity</u></p> <ul style="list-style-type: none"> • The College communicates effectively with applicants throughout the registration process. For example: <ul style="list-style-type: none"> ○ advises applicants of the progress of their application through e-mailed status updates.
Commendable Practice	<p>The College’s participation in the multi-stakeholder Citizen Advisory Group demonstrates a high level of commitment to public input in the College’s governance processes.</p>

Objectivity

- Designing criteria and procedures that are reliable and valid
- Monitoring and following up threats to validity and reliability

Assessment Outcome	<p>The College uses a variety of methods to achieve objectivity in its assessment processes. These methods support a consistent approach to assessments, by promoting a shared understanding of policies, procedures and methodologies among college staff and the registration committee. This is evident from policy documents, examples of tools for decision-makers, and information posted on the College’s website.</p> <p>To achieve consistent and reliable decisions, the College takes the following steps:</p> <ul style="list-style-type: none"> • In 2017, adopted a new national competency exam as the approved examination for registration as required by the College’s registration regulation. • develops policies to guide discussion at Registration Committee when discussing whether applicants meet registration requirements <ul style="list-style-type: none"> ○ The Registration Committee developed a policy that outlines the relevant factors for the Committee to consider when determining if an applicant meets the requirement for good character and suitability to practice. • provides annual training to all Committee members and staff involved in assessment processes
Commendable Practice	<ul style="list-style-type: none"> • The College reviewed and redesigned the method of assessing educational program equivalence for applicants that graduated from non-accredited programs, to ensure that the process and criteria meet current program standards. • The College runs an internal random audit of our new registration files twice a year to verify that the files contain the required information, that data entry is complete and that the timelines in processing were met.

Impartiality

- Identifying bias, monitoring, and taking corrective action
- Implementing strategies

Assessment Outcome	<p>The College demonstrates processes and procedures that are designed to reduce the potential for impartiality in assessment and decision-making processes.</p>
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	<p><i>Identification of Bias</i></p> <ul style="list-style-type: none"> • The College’s annual training for council and committee members addresses conflict of interest in the context of Committee roles and responsibilities. <p><i>Strategies</i></p> <p>The College strategies to mitigate bias include:</p> <ul style="list-style-type: none"> • Committee members are required to declare conflict of interest prior to each Registration Committee meeting • The College’s annual training for Council and Committee explains conflict of interest in relation to Committee roles and responsibilities.
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Fairness

- Ensuring substantive fairness
- Ensuring procedural fairness
- Ensuring relational fairness

Assessment Outcome	<p>The College exhibits fairness in its registration practices, supported by evidence from policies, annual reports, and Fair Registration Practice reports.</p> <p><i>Substantive fairness</i></p> <ul style="list-style-type: none"> • The College reviewed and redesigned the method of assessing educational program equivalence for applicants that graduated from non-accredited programs, to ensure that the process and criteria meet current program standards. <p><i>Procedural fairness</i></p> <ul style="list-style-type: none"> • The College’s applicant self-service web portal provides automated updates to applicants on the status of their applications. <p><i>Relational Fairness</i></p> <ul style="list-style-type: none"> • has a process for considering alternate sources of documentation where the applicant is unable to provide an original form of a document required for registration • ensures the registration exam administrator has comprehensive policies and procedures to review and make necessary accommodations for applicants with documented disability.
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Commendable practice	The College's jurisprudence self-study guide is designed to prepare applicants for the jurisprudence exam, by providing information about the laws, regulations, bylaws, practice standards and guidelines that govern the dental hygiene profession in Ontario.

Background

Assessment Methods

Assessments are based on the. The guide presents registration practices relating to the specific duties and general duty in the RHPA.

A regulatory body's practices can be measured against the RHPA's specific duties in a straightforward way. However, the general duty is broad, and the principles it mentions (transparency, objectivity, impartiality and fairness) are not defined in the legislation.

As a result, the specific-duty and general-duty obligations are assessed differently (see the [Strategy for Continuous Improvement of Registration Practices](#)).

Specific Duties

The OFC can clearly determine whether a regulatory body demonstrates the specific-duty practices in the assessment guide. Therefore, for each specific-duty practice, the OFC provides one of the following assessment outcomes:

- Demonstrated – all required elements of the practice are present or addressed
- Partially Demonstrated – some but not all required elements are present or addressed
- Not Demonstrated – none of the required elements are present or addressed
- Not Applicable – this practice does not apply to the (*acronym of regulatory body*)'s registration practices

General Duty

Because there are many ways that a regulatory body can demonstrate that its practices, overall, are meeting the principles of the general duty, the OFC makes assessment *comments* for the general duty, rather than identifying assessment outcomes. For the same reason, assessment comments are made by principle, rather than by practice.

For information about the OFC's interpretations of the general-duty principles and the practices that the OFC uses as a guideline for assessment, see [the OFC's website](#).

Commendable Practices and Recommendations

Where applicable, the OFC identifies commendable practices or recommendations for improvement related to the specific duties and general duty.

Sources

Assessment outcomes, comments, and commendable practices and recommendations are based on information provided by the regulatory body. The OFC relies on the accuracy of this information to produce the assessment report. The OFC compiles registration information from sources such as the following:

- Fair Registration Practices Reports, audits, Entry-to-Practice Review Reports, annual meetings
- the regulatory body's:
 - website

- policies, procedures, guidelines and related documentation templates for communication with applicants
 - regulations and bylaws
 - internal auditing and reporting mechanisms
 - third-party agreements and related monitoring or reporting documentation
 - qualifications assessments and related documentation
- targeted questions/requests for evidence that the regulatory body demonstrates a practice or principle

For more information about the assessment cycle, assessment process, and legislative obligations, see the [Strategy for Continuous Improvement of Registration Practices](#).