

College of DENTAL HYGIENISTS of Ontario

2023 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

Under section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA), which is substantially similar to section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA),

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 23 of FARPACTA and Section 22.9 of Schedule 2 of the RHPA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its 2023 Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2023.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

Please note that the 2023 version of the FRP has changed from the previous version in terms of both form and content as the OFC's enabling statutes have evolved and as the office migrates to a more permanent portal-enabled database solution.

2. Organization information

Organization name	College of DENTAL HYGIENISTS of Ontario
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3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of DENTAL HYGIENISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Dental Hygienist
Academic requirement	An applicant must successfully complete a program in dental hygiene that is equivalent to a full-time program of two years. The program must be accredited by either the Commission on Dental Accreditation of Canada (CDAC) or the American Dental Association Commission on Dental Accreditation

	(ADA/CODA). Alternatively, if the program is not accredited, the Registration Committee must consider it to be substantially equivalent to an accredited program.
Experience requirement	CDHO does not require any specific work experience for registration; clinical training is built into dental hygiene educational programs.
Language requirement	An applicant must be able to effectively comprehend and communicate in either English or French, both orally and in writing. CDHO does not require any specific proof of language proficiency, such as a language proficiency evaluation; however, applicants must be able to successfully complete the National Dental Hygiene Certification Examination (NDHCE) and, if necessary, a written and clinical competency evaluation, which are offered in English or French.
Additional information on licensing requirements (may include links to appropriate page on regulator website):	Additional information about the registration process can be found on CDHO's website under the \"Become a Dental Hygienist\" tab (cdho.org). In summary, applicants must also fulfill the following requirements: - Successfully complete the National Dental Hygiene Certification Examination (NDHCE) administered by the Federation of Dental Hygiene Regulators of Canada (Federation) - Successfully complete the Canadian Performance Examination in Dental Hygiene (CPEDH) administered by the Federation, if they did not graduate

	<p>from an accredited educational program - Successfully complete the CDHO's jurisprudence examination - Successfully complete an approved refresher course or competency assessment if they did not graduate or practice dental hygiene within the previous three years - Provide a police record check, evidence of authorization to work in Canada, and evidence of holding professional liability insurance.</p>

4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
Federation of Dental Hygiene Regulators of Canada (FDHRC)	Knowledge based exam

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of DENTAL HYGIENISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

The FDHRC is governed by a board of directors consisting of dental hygiene regulators from across Canada, including the CDHO Registrar. The FDHRC's Equivalency Evaluation Committee is responsible for evaluating the education and qualifications of applicants, while the Examination Committee is responsible for overseeing all activities connected with the development, administration, and validation of the NDHCE. To ensure accountability, CDHO representatives are directly represented on the board of FDHRC and its operational committees.

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1	<p>As part of its commitment to continuous improvement of its application and registration practices, in 2023 CDHO launched an on-going Registrant Experience Survey. Recent applicants to the CDHO are asked to complete a voluntary survey to provide feedback on the application process and identify any areas for improvement. CDHO publishes the results of this survey in a dashboard available on its website (https://cdho.org/about-the-cdho/who-we-are/reports-and-performance-data/). The dashboard summarizes responses for each of the ten sections of the application process. Results can be filtered by various criteria, including application year, applicant age, type of application, and whether the applicant identified as a member of a racialized group. Based on initial data gathered between March and September 2023, the results of the survey indicated that applicants are fairly satisfied with the CDHO's registration process, with 80% of applicants reporting that they were either "satisfied" or "very satisfied". Applicants reported satisfaction with CDHO staff, with 87% reporting they were either "satisfied" or "very satisfied" with staff interactions. Applicants found the registration process fairly straightforward, with 70% reporting that the process was either "straightforward" or "very straightforward", and clear, with 76% reporting they were either "satisfied" or "very satisfied" with the clarity of the instructions provided. Key points of feedback included recommendations to improve the CDHO website, fully digitize the application process, and improve response times by CDHO staff. CDHO will continue to conduct the survey at regular intervals to track applicant feedback.</p>
2	<p>In September 2023, CDHO launched its updated website. The new website simplifies and streamlines information for applicants, making it easier to navigate and more transparent. The "Become a Dental Hygienist" section of the website provides step-by-step instructions for applicants based on their application stream (e.g., graduates from accredited programs; graduates from non-accredited and international programs, etc.) The website also</p>

provides clear information around expected timelines for application processing and other steps in the application process.

B. Risks and Mitigations

Risk	Mitigation Measure
CDHO did not have any risk in the reporting year that impacted its ability to achieve registration outcomes for applicants.	Not applicable.

6. Changes to registration practices

During the January 1 to December 31, 2023 reporting period, College of DENTAL HYGIENISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	Yes	Emergency Class: On August 31, 2023, amendments to CDHO's Registration Regulation came into effect to establish a new Emergency Class of Certificate of Registration. The Emergency Class becomes available only if requested by the Minister of Health or if the Council is of the view that emergency circumstances exist that make it in the interest of the public to issue certificates in the Emergency Class. Applicants to the Emergency Class are exempted from completing the National Dental Hygiene Certification

		Examination, but must practise only under the supervision of a registrant in the General or Specialty Class. A registrant who holds a certificate of registration in the Emergency Class may apply for registration in the General class after a period of one year.
New or consolidated class of certificates or licenses	Yes	See answer to question above re: Emergency Class of Certificate of Registration.
Assessment of qualifications, including competency-based assessments and examinations	No	
Documentation requirements for registration	Yes	In 2023, CDHO removed the requirement for applicants to submit notarized copies of supporting/verifying documents and a copy of the application form and supporting documents by mail. Applicants can now email their completed application and supporting documents to the CDHO. CDHO is enhancing its online application portal to allow for the submission of all supporting documents online and to eliminate the need for emailing documents.
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	Yes	The CDHO made the following changes to its schedule of fees in 2023: 1. Reduction of the application fee for registration (from \$75 to \$50). 2. Removal of the fee to upgrade from a General to a Specialty certificate of registration (from \$75 to \$0)

Changes to internal review or appeal process	No	
Access by applicants to their records	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	Following the addition of new staff members in 2023, CDHO registration staff received extensive training on the registration requirements under the Registration Regulation, the registration procedures under the Health Professions Procedural Code, and how they relate to the work of the CDHO and the processing of applications. CDHO staff also received training on effective minute-taking for Registration Committee meetings.
Resources or training to support applicants to move through the licensing process	Yes	As detailed above, CDHO launched its new website in September 2023. The website provides applicants with streamlined information about the application process, making it more accessible and transparent.
Anti-racism and inclusion-based policies and practices	Yes	Demographic Data Collection: In September 2023, the CDHO added a series of demographic questions to its application and annual registration renewal forms. These voluntary questions ask dental hygienists and applicants how they identify along four diversity dimensions: Indigenous identity; visible minority identity; sexual orientation and gender identity; and disability. The data collected will help CDHO better understand

	<p>demographic trends in the dental hygiene profession and inform efforts to advance equity, diversity, and inclusion. Summarized de-identified information will be used for statistical purposes (reports, analyses, studies) and to provide figures regarding group representation in the profession. The questionnaire does not include every important diversity dimension, but the four dimensions that have been included cover aspects of identity that are generally recognized as being impacted by bias and discrimination.</p> <p>New Gender Category: In 2022, the Ministry of Health's Health Workforce Evidence Unit Capacity and Health Workforce Planning Branch Capacity Planning and Analytics Division updated its minimum data set requirements. This update included a third gender option "unspecified (X)" in addition to the existing "male (M)" and "female (F)" options. To align with the Health Professions Database data set requirements, CDHO updated its applications and annual renewal forms in 2023. The update included a new third gender option labeled "Non-Binary/Other/Prefer not to answer," which maps to the new "unspecified" category.</p> <p>Truth and Reconciliation: In April 2023, CDHO announced that all registrants would have access to "The Path: Your Journey Through Indigenous Canada," an Indigenous learning course designed to deepen their understanding of the history of the First Nations, Métis, and Inuit in the land we now call Canada. Participation in this course counts toward registrants' QA requirements. In June 2023, CDHO announced a partnership with Indspire, an Indigenous national charity, to</p>
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	<p>create the CDHO Bursary for Indigenous Students in Dental Hygiene Programs. Through this partnership, CDHO is supporting efforts to increase access to higher education for Indigenous students. CDHO has posted a land acknowledgment outside its physical office and on its website. Voice of the Patient Survey: In 2023, CDHO administered a Voice of the Patient (VOP) survey, first launched in 2022. The survey is administered in four languages – English, French, Mandarin, and Punjabi – and 2,000 patients are surveyed. The survey asks about patients' experiences with dental hygiene practice, with a focus on equity, diversity, and inclusion. CDHO uses this data to improve resources for RDHs and to develop more patient-focused information. Through this survey, CDHO learned that some patients experienced racism and discrimination during their dental appointments. A follow-up survey was conducted with those who reported these experiences and results were shared with other oral health regulators. CDHO will be working to provide resources and information to clients and RDHs to help create more inclusive and welcoming environments and promote DEI in practice (e.g., a Standard on cultural competence, modules on trauma- and violence-informed care). Staff Training: CDHO staff members continue to attend training with a focus on diversity, equity and inclusion, including the following: "Unlearn and Learn Gender Diversity and Gender Inclusive Communications, and Gender Diversity and Inclusion" – Workshop presented by the Canadian Network of Agencies of Regulation (CNAR). "Exploring Bias" – Workshop presented by the Canadian Centre for Diversity and</p>
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		Inclusion (CCDI) and the Canadian Society of Association Executives (CSAE) "Black History Month: Canada's History" – Workshop presented by Allied Property Management (CDHO's landlord)
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C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	No	
Accreditation of educational programs	No	
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	See the answer above regarding the new Emergency Class of Certificate of Registration.
Technological or digital improvements	Yes	In 2023 CDHO embarked upon significant upgrades to its database management system and registrant portal. Once completed, these upgrades will simplify the application process by transitioning to a fully integrated online system, eliminating the need for hard copy or email submission of supporting documents. With an estimated completion date of early

		2025, the new system will permit applicants to upload all supporting documents via the online application portal.
Steps to address labour shortages in the profession or trade	Yes	In 2023, the CDHO conducted a geospatial analysis to examine the distribution of the dental hygienist workforce in relation to the population distribution in Ontario, Canada. The analysis utilized anonymized data from CDHO and the Canadian census, focusing on geographic accessibility. The datasets were linked using the forward sortation area (FSA) component of Canadian postal codes, and the distribution across 520 FSAs in Ontario was examined. The analysis was conducted at three different levels based on varying aggregations of the FSA data. CDHO is aiming to publish the results of the study in 2024.
Other	No	

7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator’s membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? (Yes or No)
Members	YES

Applicants	YES
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Additional description:

CDHO asks applicants and RDHs how they identify along four diversity dimensions: Indigenous identity, visible minority identity, sexual orientation and gender identity, and disability. These questions are voluntary. The data collected will help CDHO better understand demographic trends in the dental hygiene profession and inform its efforts to advance equity, diversity, and inclusion. Summarized de-identified information is used for statistical purposes (reports, analyses, studies) and to provide figures regarding group representation in the profession. The questionnaire does not include every important diversity dimension, but the four dimensions that we have included cover aspects of identity that are generally recognized as being impacted by bias and discrimination. CDHO will continue to ask these demographic questions at registration and renewal to allow us to track changes over time.

B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes

Additional description:

See the answer to the question above.

C. Languages of service provision

College of DENTAL HYGIENISTS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes

Other (please specify)	
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D. Membership Profile

Profession Name	Total Number of Members
Dental Hygienist	15217

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Inactive	719	40
General	13857	438
Specialty	641	36

Gender	Number of Members
Female	14749
Male	468

Jurisdiction of Initial Training	Number of Members
Other provinces and territories	286
Ontario	14417
United States	418
Other International	96

Country of Initial Training	Number of Members
Canada	14703
Armenia	1

Colombia	11
Denmark	2
United Kingdom	55
China	3
Iran	2
Israel	8
Japan	2
Netherlands	1
South Africa	6
South Korea	5
United States of America	418

Official language of preference	Number of Members
English	15033
French	184

Racial identity (optional)	Number of Members
Indigenous	252
Black	209
Latin American	119
East / Southeast Asian	588
Middle Eastern	159
Not collected	5013
Other	104
White	8301
South Asian	472

E. Data Notes

In 2023, 1,651 registrants self-identified as belonging to a visible minority group, and 8,301 reported that they were not a visible minority. Additionally, 4,969 registrants chose not to answer, and 296 were unknown. It's important to note

that reporting race-based data during annual renewal is optional for registrants, and they also have the option to identify with more than one group.

F. Applicant Profile

Profession Name	Total Number of Applicants
Dental Hygienist	849

Gender	Number of Applicants
Female	780
Male	69

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	811	75
Other provinces and territories	27	5
United States	6	1
Other International	5	2

Country of Initial Training	Number of Applicants
Canada	838
United States of America	6
United Kingdom	2
South Korea	1
Jamaica	2

Official language of preference	Number of Members
English	826
French	23

Racial identity (optional)	Number of Members
Middle Eastern	14
Black	25
East / Southeast Asian	40
Latin American	14
South Asian	59
White	410
Other	275
Indigenous	12

G. Data Notes

In 2023, 158 applicants self-identified as belonging to a visible minority group, and 410 reported that they were not a visible minority. Additionally, 255 applicants chose not to answer, and 26 were unknown. It's important to note that reporting race-based data is optional for applicants, and they also have the option to identify with more than one group.

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2023. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
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Ontario	794	0	1
Other provinces and territories	24	0	1
United States	5	1	0
Other International	2	1	0

I. New Registrants

For the 2023 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants by class	Number of internationally educated registrants
Full / General/ Independent Practice	853	7

J. Data Notes

These categories include new applicants in the 2023 reporting year, applicants who submitted an application in 2022 but completed all registration requirements in 2023 before the application expired, applicants who withdrew their applications, and applicants who the Registration Committee instructed the Registrar to deny the issuance of a General Certificate of Registration to. Applications expire one year after the initial application fee is paid if all registration requirements are not met.

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants
1. Professional Misconduct 2. Did not meet registration Requirements	1 1

L. Data Notes

8. Changes Related to New Legislative and Regulatory Requirements

By Ontario law, regulated occupations must provide registration practices that are transparent, objective, impartial and fair. Non-health occupations are governed by the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)*, while health professions are governed by the *Regulated Health Professions Act, 2011 (RHPA)*.

In 2021, both statutes were amended to incorporate substantive provisions to:

- A.** Eliminate the use of Canadian experience requirements except under prescribed circumstances.
- B.** Streamline language proficiency testing requirements.
- C.** Provide for the continuity of registration processes during emergency situations.
- D.** Set registration time limits. (FARPACTA only)

College of DENTAL HYGIENISTS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of DENTAL HYGIENISTS of Ontario has taken the following measures to comply with legislative requirements on eliminating Canadian experience requirements unless an exemption is granted or an alternative is identified that meets criteria prescribed in regulations (non-health regulators) or the exceptions in legislation are met (regulated health colleges).

B. Language Proficiency Testing

Change required: No changes required

College of DENTAL HYGIENISTS of Ontario has taken the following measures to comply with recent legislative changes requiring that regulators accept language proficiency testing results derived from any of the tests accepted for immigration purposes to satisfy their language proficiency requirements:

College of DENTAL HYGIENISTS of Ontario offers applicants the following options to demonstrate language proficiency.

- Success on a licensing exam or assessment
- Education in English or French

C. Emergency Registration

Change required: Yes

College of DENTAL HYGIENISTS of Ontario has taken the following measures to comply with requirements to establish an emergency class (health colleges) or develop an emergency registration plan (non-health regulators).

See the answer to the question above on 'Registration requirements either through regulation, by-law or policy'.

Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.