

College of DENTAL HYGIENISTS of Ontario

2024 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 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

“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 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA 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 annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2024.

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.

2. Organization information

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| 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 |

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| | (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 clinical competency evaluation, which is 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 (www.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 |

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| | <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> |
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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

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| 1 | <p>In 2024 CDHO continued to administer the Registrant Experience Survey to recent applicants to garner feedback on the application process and identify any areas for improvement. The dashboard summarizes responses for each of the ten sections of the application process. The results of the 2024 survey indicated that applicants are very satisfied with the CDHO’s registration process, with overall satisfaction increasing from 80% in 2023 to 90% in 2024. The satisfaction rating improved across nearly all steps of the registration process between 2023 and 2024. Notably, satisfaction with:</p> <ul style="list-style-type: none"> • staff interaction increased from 87% in 2023 to 96% in 2024. • the straightforwardness of the registration process increased from 70% to 80% in 2024. • the clarity of instructions provided increased from 76% in 2023 to 90% in 2024. <p>Key points of feedback included recommendations to improve the online application portal and create more detailed registration guides for registrants. Other key suggestions included reducing registration fees and improving the responsiveness and helpfulness of CDHO staff. CDHO will continue to survey at regular intervals in 2025 to track applicant feedback. 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/</p> |
| 2 | <p>CDHO embarked on a project to upgrade our registrant database in 2023. The registrant database supports the Public Register and the Self-Service portal, which contains all application forms. This upgrade will enhance functionality, security, and user-friendliness.</p> |

B. Risks and Mitigations

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

During the January 1 to December 31, 2024 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 | The Registration Committee approved the 'Fourth Attempt Exam Remediation Policy' in 2024. This policy sets out the remediation and upgrading requirements for candidates who wish to take the written entry-to-practice examination (NDHCE) a fourth time following three failed attempts per subsection 3(3) of the Examinations Regulation made under the Dental Hygiene Act, 1991. Ontario is currently the only jurisdiction that permits a fourth attempt at the NDHCE. Since 2015, candidates from outside Ontario have been permitted only three attempts. All candidates must also sign an acknowledgement before their third attempt that it is their final attempt. In 2021, CDHO submitted a request to the Ministry of Health to amend the Examinations Regulation to remove the option for a fourth attempt to bring Ontario into line with the other |

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| | | provinces. To date, the Ministry has not moved forward with these proposed amendments. |
| New or consolidated class of certificates or licenses | No | |
| Assessment of qualifications, including competency-based assessments and examinations | Yes | In November 2021, the Federation of Dental Hygiene Regulators of Canada (FDHRC) published the Entry-to-Practice Canadian Competencies for Dental Hygienists. The FDHRC is working on updating its assessments, including the National Dental Hygiene Certification Examination (NDHCE), the Canadian Performance Examination in Dental Hygiene (CPEDH), and the Substantial Equivalency Assessment for graduates of non-accredited programs. These updates aim to reflect the new competencies established in the field. To ensure the validity and reliability of their assessments, the FDHRC surveyed Registered Dental Hygienists in Canada in December 2024. The survey is a critical component of the assessment development process and focuses on the criticality and frequency of each competency. Here, "criticality" refers to the relevance or importance of a competency, while "frequency" indicates how often an entry-level Dental Hygienist would typically need to perform that competency in their practice. The Jurisprudence Examination (JEM) is an open-book, multiple-choice test that all applicants to the College of Dental Hygienists of Ontario (CDHO) must complete. Its purpose is to assess applicants' understanding of the laws governing Registered Dental Hygienists in Ontario. In 2024, the CDHO undertook a comprehensive item writing process to develop |

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| | | new questions for the JEM, ensuring that the exam remains current and defensible. The new exam questions will be incorporated into the JEM in early 2025, following a psychometric analysis by the exam provider, AssessBank, and translation into French. This examination development process will take place annually to ensure that the JEM continues to serve its primary purpose: protecting the public by certifying that candidates possess the necessary knowledge, skills, attitudes, and judgment to perform essential occupational activities safely and effectively. |
| Documentation requirements for registration | No | |
| Timelines for registration, decisions and/or responses | No | |
| Registration and/or assessment fees | No | |
| Changes to internal review or appeal process | No | |
| Access by applicants to their records | No | |
| Other | No | |

B. Training, policy and applicant supports

| Registration process | Changes Made (Yes / No) | Description |
|-----------------------------|--------------------------------|--------------------|
|-----------------------------|--------------------------------|--------------------|

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| <p>Training and resources for staff who deal with registration issues</p> | <p>Yes</p> | <p>CDHO provided comprehensive training on the registration requirements outlined in the Registration Regulation and the procedures specified in the Health Professions Procedural Code to new staff in the registration department and Registration Committee members. This training emphasized the importance of these regulations to CDHO's work and the application process. Additionally, CDHO staff received training on effective minute-taking for Registration Committee meetings.</p> |
| <p>Resources or training to support applicants to move through the licensing process</p> | <p>Yes</p> | <p>CDHO updated its website and Self-Service portal for applicants, enhancing clarity and user-friendliness.</p> |
| <p>Anti-racism and inclusion-based policies and practices</p> | <p>Yes</p> | <p>CDHO continued to engage in the following anti-racism and inclusion-based initiatives in 2024: Demographic Data Collection: CDHO collects a series of demographic questions on 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 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. Truth and Reconciliation: CDHO provides</p> |

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| | <p>all registrants 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. Indspire Bursary: CDHO has partnered with Indspire, an Indigenous national charity, to 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. Voice of the Patient (VOP) survey: Since 2022, CDHO has administered a Voice of the Patient (VOP) survey. The survey is administered in four languages – English, French, Mandarin, and Punjabi – and 2,000 patients are surveyed annually. 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. In 2024, the CDHO began developing a module on trauma- and violence-informed care. This initiative was prompted by responses from the 2023 survey, which highlighted some patients' experiences with racism and discrimination during their dental appointments. The CDHO is dedicated to fostering more inclusive and welcoming environments, as well as promoting diversity, equity, and inclusion in dental practice. This commitment includes efforts such as establishing a standard for cultural competence. The results of the 2024 survey are still being finalized, but CDHO plans to publish them in early 2025 on the Voice of the Patient Dashboard on its website. https://cdho.org/voice-of-the-patient-dashboard-available/ https://www.medialearningsystems.com/CDHO/TVIC_EN/story.html Staff and Council Training: CDHO council members received a presentation on the challenges of advancing oral health among Indigenous communities in Canada, the United States, and Australia. The presentation covered various research, care delivery, and educational</p> |
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| | | initiatives aimed at improving oral health and promoting oral health equity in these Indigenous communities. CDHO staff continue to engage in training and collaborative efforts with a focus on diversity, equity and inclusion. |
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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 | No | |
| Technological or digital improvements | Yes | In 2023, CDHO started making significant upgrades to its database management system and registrant portal. Once these upgrades are completed, the application process will be simplified by transitioning to a fully integrated online system. This change will eliminate the need for hard copies or email submissions of supporting documents. The anticipated completion date for these upgrades is early 2025. |

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| Steps to address labour shortages in the profession or trade | Yes | CDHO conducted a geospatial analysis in 2023 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. In 2024, CDHO completed its analysis and is now awaiting review of the findings before publishing the study results. |
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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 |

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 above question.

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) | |

D. Membership Profile

| Profession Name | Total Number of Members |
|------------------|-------------------------|
| Dental Hygienist | 15781 |

| Class of License | Total Number of Members | Number of Internationally Educated Members |
|--------------------------------------|-------------------------|--|
| Full / General/ Independent Practice | 14415 | 428 |
| Specialty | 653 | 34 |
| Inactive | 713 | 32 |

| Gender | Number of Members |
|---|-------------------|
| Female | 15248 |
| Male | 531 |
| X (includes trans, non-binary, and two-spirit people) | 2 |

| Jurisdiction of Initial Training | Number of Members |
|----------------------------------|-------------------|
| Ontario | 15009 |
| Other provinces and territories | 278 |
| United States | 398 |
| Other International | 96 |
| Multiple Jurisdictions | 0 |
| Other/not collected | 0 |

| Country of Initial Training | Number of Members |
|-----------------------------|-------------------|
|-----------------------------|-------------------|

| | |
|--------------------------|-------|
| Armenia | 1 |
| Canada | 15287 |
| China | 2 |
| Colombia | 11 |
| Denmark | 2 |
| Iran | 2 |
| Ireland | 1 |
| Israel | 8 |
| Jamaica | 3 |
| Japan | 2 |
| Netherlands | 1 |
| South Africa | 5 |
| South Korea | 6 |
| United Kingdom | 52 |
| United States of America | 398 |

| Official language of preference | Number of Members |
|--|--------------------------|
| English | 15609 |
| French | 172 |

| Racial identity (optional) | Number of Members |
|-----------------------------------|--------------------------|
| Black | 258 |
| East / Southeast Asian | 743 |
| Indigenous | 273 |
| Latin American | 143 |
| Middle Eastern | 204 |
| South Asian | 607 |
| White | 9996 |
| Other | 141 |
| Not collected | 3416 |

E. Data Notes

In 2024, 2096 registrants self-identified as belonging to a visible minority group, and 10,280 reported that they were not a visible minority. Additionally, 3,401 registrants chose not to answer, and 4 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 | 1011 |

| Gender | Number of Applicants |
|---|----------------------|
| Female | 923 |
| Male | 87 |
| X (includes trans, non-binary, and two-spirit people) | 1 |

| Jurisdiction of Initial Training | Applications received in 2024 | Applications with decisions pending (in progress at end of reporting year) |
|----------------------------------|-------------------------------|--|
| Ontario | 989 | 93 |
| Other provinces and territories | 15 | 3 |
| United States | 1 | 0 |
| Other International | 6 | 2 |
| Multiple Jurisdictions | 0 | 0 |
| Other/not collected | 0 | 0 |

| Country of Initial Training | Number of Applicants |
|------------------------------------|-----------------------------|
| Canada | 1004 |
| China | 2 |
| Ireland | 1 |
| Jamaica | 1 |
| South Korea | 1 |
| United Kingdom | 1 |
| United States of America | 1 |

| Official language of preference | Number of Applicants |
|--|-----------------------------|
| English | 1002 |
| French | 9 |

| Racial identity (optional) | Number of Applicants |
|-----------------------------------|-----------------------------|
| Black | 32 |
| East / Southeast Asian | 84 |
| Indigenous | 18 |
| Latin American | 11 |
| Middle Eastern | 19 |
| South Asian | 70 |
| White | 552 |
| Other | 19 |
| Not collected | 206 |

G. Data Notes

In 2024, 235 applicants self-identified as belonging to a visible minority group, and 573 reported that they were not a visible minority. Additionally, 203 applicants chose not to answer. 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 2024. Some applications may have been received in the previous year.

| Jurisdiction of initial training | Successful | Unsuccessful | Withdrawn |
|---|-------------------|---------------------|------------------|
| Ontario | 894 | 0 | 2 |
| Other provinces and territories | 12 | 0 | 0 |
| United States | 1 | 0 | 0 |
| Other International | 4 | 0 | 0 |
| Multiple Jurisdictions | 0 | 0 | 0 |
| Other/not collected | 0 | 0 | 0 |

I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

| Class of registration | Total new registrants | Number of internationally educated registrants |
|--------------------------------------|------------------------------|---|
| Full / General/ Independent Practice | 965 | 7 |

J. Data Notes

Applicants have one year to complete the entire application process, including submitting all necessary documentation. Incomplete applications automatically expire one year after the application fee is paid. After that, a new application form and fee are required.

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 |
|----------------------------|--|
| | |

L. Data Notes

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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.