



**FAIRNESS** COMMISSIONER

COMMISSAIRE À L'ÉQUITÉ

**OFFICE OF THE FAIRNESS COMMISSIONER**

595 Bay Street, Suite 1201, Toronto ON M7A 2B4

## **Fair Registration Practices Report 2020**

The Fair Registration Practices Report was created as required in the:

- Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) s.20 and 23(1), for the regulated professions named in Schedule 1 of FARPACTA
- Health Professions Procedural Code set out in Schedule 2 of the Health Professions Act, 1991 (RHPA) s. 22.7(1) and 22.9(1), for health colleges

Guidelines for this report are available to download as a .pdf on the OFC website.

<https://www.fairnesscommissioner.com/en/Publications/Pages/Guidelines.aspx>

Organization: **College of Midwives of Ontario**

Name of the regulated profession: **Midwives**

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## Qualitative Information

The following qualitative information is collected for the purpose of highlighting a regulator's enhancements to improve fair access year over year, including actions that result from recommendations made in the OFC's Assessment of Registration Practices.

For each of the categories below, where applicable, please describe any improvements/changes implemented in the last year by your organization or a third-party for the purpose of changing fair access.

Please also describe the impact of these improvements/changes on applicants. If you have been working on improvements/changes over the last year that have not yet been implemented, describe your progress and the expected impact the improvements/changes will have on applicants and your organization.

Provide as much detail as possible. This can include the rationale for the improvements/changes, relevant findings from preliminary work leading up to the improvements/changes, methodology, relevant dates and anything else you think is important.

Include as much supporting material as possible to support your description (e.g., relevant reports, policies, protocols, websites, other documents and anything else you think is important). This material can be provided in the form of hyperlinks to electronic sources.

### **a.** Requirements for registration, including acceptable alternatives

#### **i)** Describe any improvements / changes implemented in the last year

Necessitated by the conditions caused by the COVID-19 pandemic, the College adapted our application process and registration requirements to facilitate the timely registration of applicants in 2020, while continuing to ensure suitability to practice and registration of qualified individuals. The following changes were implemented (see attached application form and handbook):

1. Submission of applications and all supporting documents electronically.
2. Revised payment process to enable payment online by credit card for all fees, including application, jurisprudence course and initial registration fees.



3. Worked directly with the Midwifery Education Programs (MEPs) to obtain letters confirming program completion and eligibility to graduate for all applicants prior to applicants having to submit an official transcript.
4. Worked with MEPs to directly obtain clinical experience records.
5. Due to the cancellation of the May sitting of the Canadian Midwifery Registration Examination (CMRE) by the Canadian Midwifery Regulators Council (CMRC), the Registration Committee approved the Final Clerkship Exam as the qualifying exam for entry to practice under section. 8(1)3. of the College's Registration Regulation.
6. Successful completion by applicants of the Final Clerkship Exam was confirmed directly with the MEP and the International Midwifery Pre-Registration Program (IMPP).
7. The Executive Committee agreed that applicants did not have to provide a Vulnerable Sector Check at the time of application but would be required to provide it at a later date in accordance with the College's Criminal Record Screening Policy.
8. The Registration Committee approved changes to the requirements for satisfactory evidence of continuing competency in neonatal resuscitation (NRP), cardiopulmonary resuscitation (CPR) and emergency skills (ES) as required by section 7. 3.-5. of the Registration Regulation. Certificates of training were considered valid if they were current or expired a year or less than a year prior to application.
9. Transitioned to accepting electronic letters of standing when sent directly from the source organization to the College.

ii) Describe the impact of the improvements / changes on applicants

1. While the College is working on the development of an online application portal and the College's application form has been available in fillable electronic format, prior to 2020 most applications were submitted in hard copy with original supporting documentation and cheques for the application fee and jurisprudence course. Adapting the application process to enable applicants to submit their application and all supporting documents via a secure electronic transfer provided an easy and safe way for the applicants to apply without having to mail anything to the College. This reduced the number of steps involved in submitting an application and enabled faster submission of an application, while still providing the option to mail in an application and supporting documents.
2. Prior to 2020, applicants were asked to pay their application fee and jurisprudence course fee by cheque or money order. By adapting the



payment process, applicants are now able to select credit card payment and pay all fees online. This streamlined the payment process for applicants and all applicants paid online in 2020.

3. By obtaining letters directly from the MEPs confirming eligibility to graduate from the program, successful completion of the Final Clerkship Exam, and clinical experience records, applicants did not have to provide an official transcript from their universities at the time of application. Recognizing that many organizations, including universities, were dealing with the lock down restrictions due to the COVID-19 pandemic and that official transcripts were not going to be readily available, this helped ease the application process for applicants.
4. Approval of the Final Clerkship Exam as the qualifying exam for entry to practice provided a solution that enabled applicants to meet a non-exemptible registration requirement under the Registration Regulation, even without having completed the CMRE. Without this temporary approval and the College's development of an Acknowledgement and Undertaking, recognizing the importance of the CMRE and requiring applicants to write the CMRE at its next available sitting, applicants would not have been eligible to be issued a certificate of registration until the CMRE became available (the CMRE was next offered on October 29, 2020). Applicants did not have to provide information about their successful completion of the Final Clerkship Exam as this was obtained by the College directly from the MEPs and IMPP. In addition, applicants were provided with the Acknowledgement and Undertaking following submission of an application and were able to sign and return it to the College using a secure electronic transfer.
5. Based on the potential limited access to police services in the initial stage of the pandemic in Ontario, applicants were not required to submit the results of a vulnerable sector check at the time of application. This eased the process while continuing to protect the public using the ability to request one at a later date under the College's Criminal Record Screening Policy and when more readily available.
6. Recognizing that there may be limited access to training courses in neonatal resuscitation, cardiopulmonary resuscitation and emergency skills such that applicants may not be able to provide satisfactory evidence of training, the Registration Committee approved alternative satisfactory evidence for the continuing competency requirements as outlined in the Registration Regulation. This helped to ensure that continuing competency requirements would not be a barrier to entry to practice and recognizing currency of applicants' education and the ongoing requirements for continuing competencies following issuance of a certificate of registration.
7. Given the circumstances where many organizations moved to remote work, accepting electronic letters of standing was deemed reasonable and



potentially made it easier and faster for applicants to obtain letters as needed.

In summary, the College quickly adapted the application process and registration requirements to facilitate the timely application and registration of applicants despite unexpected challenges caused by the pandemic.

iii) Describe the impact of the improvements / changes on your organization

While it required a quick response and adaptation as well as work with the Registration and Executive Committees and stakeholders, the implemented changes were positive and enabled the College to continue to effectively process applications and issue certificates of registration even as we moved to remote work.

Facilitated a speedier transition to electronic application submission and online payment.

The College continues to collaborate with stakeholders to facilitate the exchange of information directly to reduce the need for the submission of original hard copy documentation.

**b. Assessment of qualifications**

i) Describe any improvements/changes implemented in the last year

No major changes to the assessment of qualifications other than the change to the qualifying examination noted above.

The International Midwifery Pre-Registration Program (IMPP) continued to provide assessment and bridging for internationally educated midwives. The IMPP adapted their program delivery to address the limits imposed on in-person learning due to the COVID-19 pandemic. Prior to COVID-19, 80% of program delivery was in-person, 20% was online or at distance, for IMPP 2020/21, 80% of program delivery was at distance and 20% in-person.

ii) Describe the impact of the improvements/changes on applicants

The IMPP continued its program, however, as was the case for some MEP students, some clinical clerkships were cancelled. Those individuals who were unable to complete the IMPP due to their clerkships being suspended continued



to participate in the IMPP as part of the 2020/21 cohort, including continuing their clinical clerkships, at no additional cost.

In addition, the IMPP adapted the admissions assessments to accommodate the circumstances around the pandemic and the inability to conduct in-person assessments, enabling applicants to the IMPP to be assessed and enter the program where eligible.

- iii) Describe the impact of the improvements/changes on your organization

The College continued to be able to process applications for registration from IMPP graduates and all applicants who applied were issued a certificate of registration.

**c. Provision of timely decisions, responses, and reasons**

- i) Describe any improvements/changes implemented in the last year

No changes in relation to the provision of timely decisions, responses and reasons.

- ii) Describe the impact of the improvements/changes on applicants

Decisions and reasons continue to be issued to all applicants referred to a panel of the Registration Committee.

In addition, applicants are provided with as much information as possible following a panel meeting to help them move forward in the process even prior to the issuance of the formal decision and reasons.

- iii) Describe the impact of the improvements/changes on your organization

None to report.

**d. Fees**

- i) Describe any improvements/changes implemented in the last year

In accordance with the College's Fees and Remuneration By-laws, the annual registration fee for all classes of registration increased by 2%. The annual administration fee for every class remains \$50.



The initial registration fee continues to be prorated for new members based on the month of registration and the annual administration fee remains \$50.

The application fee did not change and remains at \$100.

- ii) Describe the impact of the improvements/changes on applicants

No impact on applicants. No new fees required.

- iii) Describe the impact of the improvements/changes on your organization

No impact to report.

**e. Timelines**

- i) Describe any improvements/changes implemented in the last year

Applications continued to be processed upon receipt and based on requested dates for registration where applications were complete and all registration requirements were met.

- ii) Describe the impact of the improvements/changes on applicants

Generally, the changes implemented as a result of the COVID-19 pandemic enabled applicants to more readily submit supporting documents and any outstanding requirements.

- iii) Describe the impact of the improvements/changes on your organization

The College could readily process complete applications and issue certificates of registration where all requirements were met, based on the streamlined application process and the availability of Ontario Midwifery Program funding.

**f. Policies, procedures and/or processes, including by-laws**

- i) Describe any improvements/changes implemented in the last year

As mentioned above, the College implemented several procedural changes to accommodate the circumstances created by the pandemic. Including electronic submission of applications and supporting documentation. An Acknowledgment and Undertaking process was approved by the Registration Committee to allow



for completion of the Canadian Midwifery Registration Examination (CMRE) at its next available sitting if the applicant had successfully completed the Final Clerkship Exam, which the Registration Committee approved for the purpose of s 8(1)3. of the Registration Regulation made under the *Midwifery Act, 1991*.

No other changes to policies or By-laws were implemented.

- ii) Describe the impact of the improvements/changes on applicants

Applicants who were scheduled to write the May sitting of the CMRE who had successfully completed the Final Clerkship Exam and had completed the required education program or the IMPP were able to apply for registration and be issued a certificate of registration, if all requirements were met, despite the cancellation of the CMRE. Had this not been possible, applicants would have had to wait until the CMRE next became available in order to be eligible for registration, which could have delayed registration by several months.

- iii) Describe the impact of the improvements/changes on your organization

This solution to the unusual and emergency situation was prefaced on enabling timely access to the profession and ensuring members of the College are qualified, skilled and competent. The College ensured that there were safeguards in place such that new registrants would practice under appropriate mentorship or supervision of more experienced midwives as they started their career.

#### **g.** Resource for applicants

- i) Describe any improvements/changes implemented in the last year

The College continued to publish information for applicants, including our pandemic response information, on the College's [website](#). The application form and handbook were updated to highlight the changes in the application processes for 2020.

- ii) Describe the impact of the improvements/changes on applicants

Easy access to registration information, the application form and handbook provided applicants with the information they needed to be able to successfully complete and submit an application for registration to the College.



Where possible, information was also shared with stakeholders to provide to applicants as applicable.

- iii) Describe the impact of the improvements/changes on your organization

No impact on the organization.

**h. Review or appeal processes**

- i) Describe any improvements/changes implemented in the last year

No changes in 2020.

- ii) Describe the impact of the improvements/changes on applicants

No changes in 2020.

- iii) Describe the impact of the improvements/changes on your organization

No changes in 2020.

**i. Access to applicants' records**

- i) Describe any improvement/changes implemented in the last year

No changes in 2020.

- ii) Describe the impact of the improvements/changes on applicants

No changes in 2020.

- iii) Describe the impact of the improvements/changes on your organization

No changes in 2020.

**j. Training and resources for registration staff, Council, and committee members**

- i) Describe any improvements/changes implemented in the last year

Following March 2020, all Council and Committee meetings were shifted to a virtual format using Microsoft Teams. The College continued to implement



orientation and training for Council and Committees members. Members who join mid-year receive separate orientation and training.

Orientation sessions may or may not include external speakers, are specific to the statutory Committee and generally include:

- The role of the Committee
- The mandate under the RHPA
- Relevant legislation and regulations
- The concept of procedural fairness
- College obligations under the fairness legislation and labour mobility legislation
- Confidentiality and conflicts of interest
- Appeals process
- Chair training

All registration staff attended the CNAR conference in November 2020.

- ii) Describe the impact of the improvements/changes on applicants

Ongoing orientation and training helps to ensure applications are processed in accordance with the governing legislation, College policies and the principles of fairness, transparency, objectivity and impartiality.

- iii) Describe the impact of the improvements/changes on your organization

Orientation and training of Council, Committee Members and Staff helps facilitate more effective implementation of the College's registration program with respect to decision making around entry and suitability to practice.

**k. Mutual recognition agreements**

- i) Describe any improvements/changes implemented in the last year

No changes in 2020.

- ii) Describe the impact of the improvements/changes on applicants

No changes in 2020.

- iii) Describe the impact of the improvements/changes on your organization

No changes in 2020.



**I. Describing any improvements/changes implemented in the last year**

i) Describe any improvements/changes implemented in the last year

No other items that have been identified in previous questions.

ii) Describe the impact of the improvements/changes on applicants

No other items that have been identified in previous questions.

iii) Describe the impact of the improvements/changes on your organization

No other items that have been identified in previous questions.

m. Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year

There have been no registration-related amendments to our enabling legislation nor regulations in the past year.

Provide any additional information:

**Quantitative Information**

The following quantitative information is collected for the purpose of observing statistical changes and trends related to application, licensure, appeals and staffing year over year.

**a. Languages**

Indicate the languages in which application materials and information about the application process are available.

Language	Yes/No
English	Yes
French	No

Other (please specify):

**b. Gender applications**

Indicate the number of applicants in each category as applicable



Gender	Number of applicants
Male	2
Female	74
None of the above	0

Additional comments:

c. Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender	Number of members
Male	3
Female	1025
None of the above	0

Additional Comments:

For the following sections d,e & f, the OFC recognizes that the term initial education infers that applicants may receive their education in multiple jurisdictions.

For the purpose of these questions, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

d. Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education in the profession or trade

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
66	0	1	9 total:  1 Brazil 1 Ethiopia 1 Guyana 1 India	0	76



			1 Iran 2 Lebanon 1 Mexico 1 Syria		
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Additional comments:

e. Jurisdiction where applicants who became registered members obtained their initial education

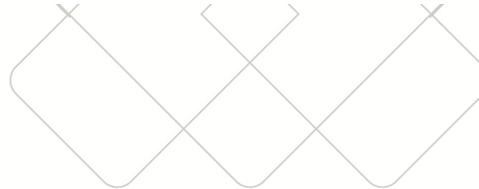
Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
64	0	1	8 total:  1 Brazil 1 Ethiopia 1 Guyana 1 India 1 Iran 1 Lebanon 1 Mexico 1 Syria	0	73

Additional comments:

f. Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education in the profession or trade.



Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
876	15	31	106 total: 1 Algeria 1 Belgium 1 Brazil 6 China 1 Ethiopia 2 France 1 Germany 1 Guyana 1 Hungary 2 India 27 Iran 2 Lebanon 1 Malta 1 Mexico 1 Morocco 3 Netherlands 2 New Zealand 1 Peru 1 Philippines 3 Poland 2 Russia 1 South Africa 1 Sweden 1 Switzerland 2 Syria 35 UK 5 Venezuela	0	1028



## g. Application processed

Indicate the number of applications your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	58	5	1	4	0	68
Applicant actively pursuing licensing. Those who had some contact with your organization in the reporting year	64	6	1	5	0	76
Inactive applicants. Those who had no contact with your organization in the reporting year.	0	0	0	0	0	0
Applicants who met all requirements and were authorized to become members <u>but did not</u> become members	2	0	0	0	0	2
Applicants who became <u>fully</u> registered members	61	6	1	5	0	73
Applicants who were authorized to receive an alternative licence <u>but were not</u> issued a licence	1	0	0	0	0	1
Applicants who were issued an alternative class of licence*	10	1	1	5	0	17



- An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments:

#### h. Classes of certificate/licence

Provide a description of the classes of certificate/license offered by your organization. You should have at least one class listed.

#	Certification	Description
1	General	Practice with no restrictions.
2	Supervised Practice	Practice under supervision.
3	Transitional	Practice with restrictions and under supervision.
4	Inactive	Not practising.

Additional comments:

#### i. Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applicants that were subject to an internal review or that were referred to a statutory committee of your governing council, such as Registration Committee	2	0	0	1	0	3
Applicants who initiated an appeal of a registration decision	0	0	0	0	0	0
Appeals heard	0	0	0	0	0	0



Registration decisions changed following an appeal	0	0	0	0	0	0
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Additional comments:

j. Paid Staff

Provide the number of paid staff employed by your organization in the categories shown, as of December 31, 2020.

You may use decimals if you need to count half units. For example, on full-time employee plus one part-time employee will be equivalent to 1.5 employees.

Category	Number of staff
Total number of staff employed by the regulatory body	13
Number of staff involved in the appeals process	2
Number of staff involved in the registration process	6

Additional comments:

Submission

**Name of individual with authority to sign on behalf of the organization:**

Kelly Dobbin

**Title:** Registrar & CEO, College of Midwives of Ontario

**Date:** April 30, 2021

