

College of PHYSICIANS AND SURGEONS 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 PHYSICIANS AND SURGEONS 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 PHYSICIANS AND SURGEONS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Physician
Academic requirement	Medical degree listed in WHO (Reg. 865/93), or MD that meets the requirements of the policy Alternatives

	to Degrees in Medicine, or Doctor of Osteopathic Medicine as outlined in D.O. Policy.
Experience requirement	Under Regulation: Clerkship at accredited medical school in Canada, or 1-year postgraduate medical education or 1-year active medical practice. Physicians can be exempted from the above requirement under the One Year Canadian Practice Exemption Policy.
Language requirement	While CPSO does not require language proficiency testing, we posted on our website the acceptable testing that CPSO would accept.
Additional information on licensing requirements (may include links to appropriate page on regulator website):	

4. Third party assessments

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

Organization name	Function
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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 PHYSICIANS AND SURGEONS of Ontario takes the following measure(s) to ensure fair and timely assessments:

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5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Approved new policies: reduced barriers and increased routes to registration for internationally trained and educated physicians.
2	Revised registration policies: removed requirements for supervision and assessment for several policies which has reduced barriers for physicians and increased access to services.
3	Waived application fees for Moonlighting and Out-of-Province Electives to facilitate increases in physician/hospital staffing.

B. Risks and Mitigations

Risk	Mitigation Measure
Operating within the legislative framework can present challenges to licensing.	We have developed and revised various policies to provide alternative routes to licensure, either by recognizing additional qualifications or providing exemptions to the legislation. We continue to stay up to date with changes across Canada and continue to look for ways to align our policies where possible.

6. Changes to registration practices

During the January 1 to December 31, 2023 reporting period, College of PHYSICIANS AND SURGEONS 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	<p>Emergency Circumstances Practice: The Registration Committee developed amendments to the Registration Regulation under the Medicine Act, 1991, setting out a new Emergency Circumstances Practice registration class. The regulation grants Council the power to determine when emergency circumstances exist, taking into consideration whether it is in the public interest to make the class of registration available. The new Emergency Circumstances Practice registration class mirrors approaches in existing classes (e.g., Supervised Short Duration and Temporary Independent Practice certificates), setting out minimum requirements that must be met (in this case, a degree in medicine, a year of postgraduate medical education at an accredited medical school, and an undertaking to practise under supervision). The regulation further specifies that the certificate is issued for one year, which the Registrar may renew while emergency circumstances persist.</p> <p>Practice Ready Assessment Program: In 2023, the Board (previously Council) approved the policy to facilitate a practice ready assessment (PRA) program in an effort to help qualified internationally educated physicians (IEPs) enter practice. Practice Ready Ontario (PRO) is designed to assess IEPs over a 12-week period with direct supervision and observation, deploy candidates to high-need communities with a Return of Service (ROS) commitment, and provide a path to independent practice.</p>

	<p>Touchstone Institute is responsible for establishing the eligibility and program requirements; however, it has consulted with CPSO to ensure alignment with the licensure requirements we need to establish. The Board approved the Registration Committee's recommendations of the terms, conditions and limitations for the certificates of registration that would facilitate this initiative. Alternative Pathways: The Board approved changes to the Alternative Pathways to Registration policy. The changes included addition of a third route to licensure (Pathway C) for physicians who were enrolled in an accredited residency program in the United States and were eligible to sit the American Board examinations ("board-eligible"). Physicians approved under Pathway C by the Registration Committee are required to practice under supervision in Ontario for a maximum of three years or, until they have successfully passed their American Board examinations. The Board also approved changes to Pathway A to grant US board-certified physicians a restricted certificate to practice independently in Ontario without supervision and assessment. The approved changes have reduced barriers to licensure in Ontario for board-certified and board-eligible physicians. Approval to waive application fees for Residents Working Additional Hours for Pay: The application fee for residents moonlighting during the 2023/2024 academic year was waived. During the COVID-19 pandemic residents utilized the Residents Working Additional Hours for Pay policy to support/alleviate hospital staffing and capacity pressures during the Covid-19 Pandemic. Waiving the fee recognizes the ongoing efforts</p>
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	<p>by Ontario's residents to provide system coverage. Approval to waive application fees for out-of-province elective fees: To remove barriers to registration in Ontario and alleviate strain on healthcare system and improve inter-provincial mobility. Recognition of Certification Without Examination Issued by CFPC: Reduced barriers to registration by working with the CFPC to recognize the training and certification from alternative jurisdictions as equivalent to Canadian training in family medicine. This policy has facilitated the registration of internationally educated physicians. Recognition of RCPSC Subspecialist Affiliate Status (SEAP): Approval of the SEAP policy has enabled a new group of physicians to apply for a certificate of registration in Ontario who previously did not have a route to independent practice. The policy applies specifically to individuals who are subspecialists but have not obtained certification in their primary specialty. Academic Registration: To facilitate the registration of internationally educated physicians and reduce barriers to practice, the Board approved changes to the Academic Registration policy. The revision has enabled academic physicians the opportunity to receive a scope-limited restricted certificate of registration after five years of practice in an academic setting, without undergoing a practice assessment. Specialist Recognition: In keeping with the relevant changes to above-mentioned policies, the Specialist Recognition in Ontario Criteria policy was also amended to accommodate revised/new routes to registration and allow newly eligible physicians to be recognized as specialists in Ontario.</p>
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New or consolidated class of certificates or licenses	Yes	See above for new certificates of registration via policies.
Assessment of qualifications, including competency-based assessments and examinations	Yes	In our effort to reduce barriers for qualified individuals to practice, we created and revised new policies (see above) that accept alternative qualifications to those in the Regulation. Changes were also made to several policies removing barriers to practice and eliminating additional requirements such as supervision and practice assessment.
Documentation requirements for registration	Yes	Working alongside the Canadian Medical Regulatory Authorities (MRAs) we have truncated the application process including an expedited application for out of province physicians, and eliminated duplication in requirements requested.
Timelines for registration, decisions and/or responses	Yes	The Recognition of Certification without Examination issued by the College of Family Physicians of Canada and Acceptable Qualifying Examination policies were approved by the Board as a directive by the Registration Committee which enabled these applications to be processed without referral to the Registration Committee. These changes streamlined the application process as applications no longer needed to be referred to the Committee for approval.
Registration and/or assessment fees	Yes	Approved for additional year to remove the application fee for Residents Working Additional Hours for Pay and Out-of-Province Electives
Changes to internal review or appeal process	Yes	As described above, the approval of two new Directives which eliminate the requirement for Registration Committee review, provided all

		requirements are met. This allows for a swifter, more efficient processing time.
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	Staff undertook training in Just Culture with a focus on recognizing and reflecting on unconscious biases in the registration process.
Resources or training to support applicants to move through the licensing process	Yes	We launched a review of the Registration and Membership related webpages to provide increased clarity, plain language and use of videos and infographics. This is a continuous improvement initiative and will be ongoing.
Anti-racism and inclusion-based policies and practices	Yes	CPSO continues to examine how we as an organization can bring equity, diversity and inclusion (EDI) in our processes and policies. CPSO has engaged with internal and external experts to provide training and education in accessibility, disability, inclusion, anti-racism, and upholding the rights of LGBTQ2S+ and other underserved communities. Staff, Committee and Board have participated in training in Just Culture with a focus on recognizing and reflecting on implicit biases in registration processes, as well as promoting internal speaker events and resources in topics including anti-racism, disability, and inclusivity for all. All Board and Committee members participated in educational sessions on Just

		Culture, Disability and Ableism, Unhoused Populations.
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C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	Yes	The Registration Committee continues to work closely with several stakeholders, including medical schools, certifying bodies and resident organizations, to ensure we are proactively regulating the profession.
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	As detailed above, the Emergency class of Registration came into Regulation.
Technological or digital improvements	Yes	The College continues to make improvements to our online system to provide enhancements.
Steps to address labour shortages in the profession or trade	Yes	Revising and creating new policies to allow for additional routes to licensure, as detailed above.
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	No
Applicants	No

Additional description:

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B. Other identity-based or demographic data collected

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

Additional description:

We collect gender-based data and self-reported data on languages spoken.
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C. Languages of service provision

College of PHYSICIANS AND SURGEONS 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
Physician	47795

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	37650	10437
Provisional/Limited License/Certificate	5169	4611
Emergency Class/Certificate	22	20
All Other Classes	4954	1295

Gender	Number of Members
Male	26022
Female	21635
X (includes trans, non-binary, and two-spirit people)	33
Other / not collected	105

Jurisdiction of Initial Training	Number of Members
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Ontario	23784
Other provinces and territories	7640
United States	837
Other International	15502
Multiple Jurisdictions	32

Country of Initial Training	Number of Members
Canada	31432
Ireland	1511
India	1412
United Kingdom	981
Egypt	859
United States of America	839
Pakistan	788
Saudi Arabia	757
Iran	622
Nigeria	505
Grenada	463
Australia	451
Iraq	400
Saint Kitts and Nevis	383
South Africa	367
Poland	329
Brazil	269
Libya	252
Israel	251
Dominica	199
Romania	172
Sri Lanka	167
Russia	166
Philippines	155
Colombia	138
Mexico	127
Jamaica	119
China	118

Hong Kong	110
Germany	104
Italy	103
Argentina	92
Syria	91
Kuwait	89
United Arab Emirates	86
Ukraine	85
Hungary	81
Bangladesh	78
Barbados	77
Jordan	77
Bahrain	74
Oman	63
France	63
Antigua and Barbuda	61
Lebanon	61
Czechia	56
Sudan	52
Spain	51
Chile	50
Trinidad and Tobago	46
Cayman Islands	43
Netherlands	42
Switzerland	41
New Zealand	37
Greece	33
Turkiye	33
Dominican Republic	32
Japan	31
Ethiopia	31
Thailand	30
Vietnam	30
Ghana	28
Belgium	28
Saint Lucia	27
Venezuela	25
Peru	24

Cuba	24
Bulgaria	23
Kenya	22
Yemen	22
Uganda	21
Malaysia	20
Congo	20
Costa Rica	19
Guyana	19
Angola	16
Nepal	16
Singapore	16
Serbia	15
Albania	15
Belarus	15
Austria	15
Zimbabwe	14
Myanmar	14
Palestine State	14
Slovakia	12
Haiti	11
Algeria	10
Tanzania	10
Qatar	10
Morocco	9
Belize	9
Latvia	9
Kazakhstan	9
Moldova	8
Malta	8
Tunisia	8
Uruguay	7
Uzbekistan	7
Senegal	7
Panama	7
Portugal	7
Guatemala	7
Indonesia	6

Armenia	6
Ecuador	6
Croatia	6
Zambia	6
Sweden	5
Rwanda	5
North Macedonia	5
Afghanistan	5
Bolivia	5
Cameroon	4
El Salvador	4
Estonia	4
Norway	4
Somalia	4
Nicaragua	3
Mauritius	3
Malawi	3
Lithuania	3
Kyrgyzstan	3
Iceland	2
Honduras	2
Denmark	2
Bosnia and Herzegovina	2
Gambia	1
Georgia	1
Madagascar	1
Mongolia	1
Paraguay	1
Togo	1
Other Countries	799

Official language of preference	Number of Members
English	47774
French	21

Racial identity (optional)	Number of Members
Not collected	47795

E. Data Notes

A.5. - Language is self-reported. In the "English" number listed above, members listed the following languages: 35363 Members listed English Only. 5710 Members listed English and French (i.e., no preference). 6701 Members did not specify a language preference. A.6 - The CPSO does not collect racial identity.

F. Applicant Profile

Profession Name	Total Number of Applicants
Physician	6960

Gender	Number of Applicants
Male	3634
Female	3264
X (includes trans, non-binary, and two-spirit people)	11
Other / not collected	51

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	2064	27
Other provinces and territories	1045	10
United States	170	3
Other International	3253	77

Multiple Jurisdictions	428	293
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Country of Initial Training	Number of Applicants
Canada	3111
Saudi Arabia	406
Ireland	313
India	218
United Kingdom	180
United States of America	172
Pakistan	149
Nigeria	136
Australia	114
Iran	108
Grenada	103
Saint Kitts and Nevis	96
Israel	92
Brazil	92
Egypt	89
Poland	47
Colombia	45
Barbados	45
Philippines	41
Kuwait	31
Jordan	30
Mexico	29
Italy	29
Oman	29
Iraq	27
United Arab Emirates	26
Spain	24
Argentina	24
Bahrain	23
Lebanon	23
Sudan	23
Germany	22

Chile	22
Ukraine	21
South Africa	20
Japan	20
Syria	18
Jamaica	17
Antigua and Barbuda	16
Hungary	15
Thailand	15
Netherlands	14
Romania	14
Russia	14
Hong Kong	13
France	12
China	12
Bangladesh	11
Libya	11
Turkiye	11
Angola	10
Dominica	9
Ethiopia	9
New Zealand	9
Switzerland	9
Malaysia	8
Nepal	8
Portugal	8
Greece	8
Cuba	8
Czechia	7
Belgium	7
Guyana	7
Sri Lanka	7
Trinidad and Tobago	7
Yemen	7
Venezuela	5
Singapore	5
Palestine State	5
Kenya	5

Belize	5
Costa Rica	5
Dominican Republic	4
Austria	4
Ghana	4
Malta	4
Saint Lucia	4
Peru	3
Qatar	3
Zimbabwe	3
Tunisia	3
Uganda	3
Moldova	3
Croatia	3
Congo	3
Cayman Islands	2
Afghanistan	2
Albania	2
Cameroon	2
Lithuania	2
Kazakhstan	2
Guatemala	2
Tanzania	2
Uruguay	2
Myanmar	2
Serbia	2
Senegal	1
Slovenia	1
Somalia	1
Sweden	1
Norway	1
Rwanda	1
Zambia	1
Haiti	1
Indonesia	1
Latvia	1
Mongolia	1
Bolivia	1

Belarus	1
Denmark	1
Estonia	1
Other Countries	548

Official language of preference	Number of Members
French	6
English	6954

Racial identity (optional)	Number of Members
Not collected	6960

G. Data Notes

B.4. - Applicants self-reported languages. The number of applicants listed in "English" is broken down as outlined below: 2041 Applicants listed English Only
 251 Applicants listed English and French
 4662 Applicants did not specify a language
 B.5. The CPSO does not collect racial identity.

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
Ontario	1944	1	92
Other provinces and territories	992	1	42
United States	163	0	4

Other International	3077	12	87
Multiple Jurisdictions	14	8	113

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	1827	701
Provisional/Limited License/Certificate	2199	1952
Emergency License/Certificate	50	36
All Other Classes	2152	585

J. Data Notes

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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

Other/not collected	0	0
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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
Other/not collected	6	0

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. Does not satisfy the requirements set out in the Regulation	

<p>2. Does not satisfy the policy requirements</p> <p>3. Does not meet the Section 2 non-exemptible requirements.</p>	
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L. Data Notes

B.10. Two appeals were withdrawn in 2023. One appeal was withdrawn in 2024. Other appeals are still ongoing.

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 PHYSICIANS AND SURGEONS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of PHYSICIANS AND SURGEONS 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).

We were not required to make any changes to our process as we already had a policy that exempts Canadian practice experience.

B. Language Proficiency Testing

Change required: Yes

College of PHYSICIANS AND SURGEONS 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:

While CPSO does not require language proficiency testing, we posted on our website the acceptable testing that CPSO would accept.

College of PHYSICIANS AND SURGEONS of Ontario offers applicants the following options to demonstrate language proficiency.

- CELPIP (General)
- Other language proficiency tests
- Success on a licensing exam or assessment
- Education in English or French
- Other (please specify) IELTS (Academic), TEF Canada, TCF Canada

C. Emergency Registration

Change required: Yes

College of PHYSICIANS AND SURGEONS 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).

As detailed above, in 2023 we introduced the Emergency Class of Registration into the Registration Regulation.

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.