

# Fair Registration Practices Report

## Dental Surgeons (2010)

The answers that you submitted to OFC can be seen below.

This Fair Registration Practices Report was produced as required by:

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

### Provision of Information About Registration Practices (1 / 13)

**Describe how you make information about registration practices available to individuals applying or intending to apply for registration. Specify the tools used to provide information, and the manner in which you make that information available, current, accurate and user friendly in each of these subcategories:**

#### a) steps to initiate the registration process

The first step of any registration process is contact. Applicants telephone, email or visit the College website. Regardless of how contact is made, the College aims to be transparent and as clear as possible in the way it describes the registration application process. Misinformation or a lack of clarity only creates problems and delay for both applicants and the College. We have had information sheets for approximately 26 years that list and describe the registration requirements in detail. We try to make it user friendly by keeping it simple and direct. In addition to listing the requirements in a step by step fashion, third party contact information is given where applicable, the fees for registration are provided and a question and answer section addresses the most common problem areas. The information sheets are updated annually but we also amend and hopefully improve them as processes evolve and we receive feedback from applicants. These forms are on the College's website and can be printed off. They are electronically sent out on a daily basis in response to email inquiries and are available at the College for pick up or can be mailed. The application form is of course also on the website in a user friendly "fillable" form and available through other means.

In addition to the information sheets, the "Registration/Licensing" index on the home page of the College's website provides a quick overview of the most basic requirements for all classes (types) of certificate of registration (license). There is also additional information on other processes such as referrals to the Registration Committee or appeals. Furthermore, the index includes a dedicated section labelled "Internationally Educated/Trained". This section contains a Career Map developed for and approved by the Ontario Ministry of Citizenship and Immigration. It is quite extensive and detailed. It explains who and what the RCDSO is and its government appointed authority. It clearly describes the registration requirements, what documents to send, who to contact and where to find related information on bridging programs, examinations and appeals. It includes costs, timelines and even labour market information. For those who prefer the legal or originating source of the registration requirements, Ontario Regulation 205/94, as amended, "Registration", the government legislation respecting dentistry is on the College's website under its own heading.

In addition to these paper based resources, registration staff are well trained to be knowledgeable and proficient at providing verbal answers to phone or in person enquiries.

## b) requirements for registration

There are several different classes of certificate of registration, each having specific requirements for that class. Each class of certificate, therefore, has its own information sheet and as stated above are readily available from a variety of sources. To ensure up-to-date accuracy the information is reviewed both annually and as policies or regulations change. We are always open to client feed-back and if there are consistent comments that a section is not being understood or information is missing then the forms are amended accordingly. Furthermore, as a safeguard no one staff person can initiate or unilaterally change this material. It must be vetted by the Supervisor and Manager and even if initiated by them would always have multiple eyes performing a proof read.

In addition, changes to processes, warnings of impending deadlines for a process or specific announcements are frequently also displayed on the College's "What's New" section of the home page of our website so that visitors have up front information.

## c) explanation of how the requirements for registration are to be met, such as the number of years of schooling required for a degree to be deemed equivalent to an Ontario undergraduate degree, length and type of work experience, credit hours or program content

The information sheets described earlier do not just list the requirements as described in the legislation. Regulations are not always easy to read for the lay individual and that is why the information sheets are a better tool as they are in plain language and therefore more user friendly. They are regularly reviewed for accuracy. Each requirement listed also has an explanation of how to prove it, the supporting documentation to send, the forms to be filled and so forth plus the contact information and links for those who have not yet met the requirements. The additional steps for the internationally trained, e.g. bridging program or equivalency assessment, are also fully outlined in our fact sheets and the government approved "Career Map" where contact information and links are again provided. Our fact sheets explain that programs must be "accredited" and offer direction to the Commission on Dental Accreditation, the National Dental Examining Board of Canada and the American Dental Association websites. The web addresses are given and electronic links attached if using the internet.

## d) any education or practical experience required for registration that must be completed in Ontario or practice that must be supervised by a member of the profession who is registered in Ontario

\*\*\* SAME AS LAST YEAR \*\*\*

Experience is not necessary and new graduates of dental programs can be licensed upon graduation. Education must be accredited but does not have to occur in Ontario. There are over seventy Universities in Canada and the United States that offer accredited dental programs. The information sheets etc., already referenced, have contact and website information for those interested in applying to these schools. Supervision of a member of the profession is not a requirement.

## e) requirements that may be satisfied through acceptable alternatives

Registration requirements are determined by legislation and those considered essential, such as the need to have a four year dental degree, have no alternative. Alternatives respecting supporting documentation are reviewed in section "h".

There are many options as to where recognized training can be obtained, clearly outlined in the College materials. For internationally trained candidates, 2010 saw the development of an alternative path to attending the bridging/qualifying/degree completion programs. This path, called the "NDEB Equivalency Process", is now described on the NDEB website and referenced in our various materials. The applicable information sheets were quickly and accurately updated with this new information upon the process being approved. Our Career Map for the internationally trained was updated at the same time and the Ministry of Citizenship and Immigration/Global Experience Ontario notified to update the Career Map on their website.

f) the steps in the assessment process

For those who completed their dental program in Canada or the United States there is no further "assessment". Even the national examination is, for Canadian graduates and those in the bridging programs, completed during the final months of the dental programs. Those trained in the United States similarly complete the exam at the same time or shortly after graduating. Candidates are free therefore to start the application process as described on our website, in the information sheets, during phone conversation or by return correspondence.

For the internationally trained, College material in all venues explain the necessity to complete the two year advanced standing program or, new for 2010, the NDEB Equivalency Process. For candidates still residing outside of Canada, web users can access a self-assessment tool on the NDEB website to help them determine eligibility. The next step is to submit an application for admission to the Universities of choice, for whichever process they've been approved for. Again, candidates can phone, mail, email, go to our website, the referenced 3rd party websites or visit the College to obtain information.

g) the documentation of qualifications that must accompany each application; indicate which documents, if any, are required only from internationally trained applicants

The requirements for registration are the same, how candidates obtain those requirements may be different, e.g. completion of an accredited dental program or completion of a bridging program or assessment. The basic supporting documentation that must accompany an application is the same for all applicants. There are different kinds of registration certificate (license) where the documentation required may vary slightly. One example would be those seeking a license to be a professor at a University. He/she would have to provide a letter from the University confirming the appointment to the Faculty. All requirements and those specific to a particular form of certificate/license are clearly described in our information sheets which, as explained, are user friendly and kept up to date.

h) acceptable alternatives to the documentation if applicants cannot obtain the required documentation for reasons beyond their control

The College does provide for exceptions on a case by case basis. In 99.99% of the cases the applicant is capable of obtaining the required documentation. The acceptable alternatives are not listed because it's highly dependant on what jurisdiction (country) the applicant is coming from. Regrettably we have experienced examples of applicants attempting to avoid a requirement by claiming that it's impossible or too difficult to obtain. Obtaining letters of standing is one of the most contentious examples. Some try to submit an affidavit in lieu of proper documentation. We track and save copies of documentation from every country and can offer contact information. We take whatever time is necessary to explain this process to applicants and to assist them. To accept substitutes when proper documentation can be obtained would be in contravention of our

mandate to perform due diligence and protect the public.

In rare and extreme cases, e.g. a refugee who has no documentation, we will accept a statutory declaration. Even in these cases often the applicant has other relevant/supporting documentation when you make the right inquiries. We also fully recognize that basic administrative functions are lost in countries experiencing civil disruption or war. Recent examples are Iraq and Afghanistan; several years ago it was Bosnia. The situation is always gauged by current events and circumstances. We will suggest alternative documentation or sources of information and where appropriate forgo the requirement by way of an affidavit.

i) how applicants can contact your organization

Very easily by email, phone, mail and in person.

j) how, why and how often your organization initiates communication with applicants about their applications

As to how we communicate with applicants, the answer is by any means necessary. It is usually, however, dictated by the applicant themselves on their application form, for example if they're in transition and only wish to be contacted by email or cell phone. We will typically choose the fastest method, often phone or email whenever possible or when in doubt but follow-up with written correspondence as well so that everything is well documented on both sides. As to why we would initiate contact, that varies with each application but typically it involves notifying candidates about improper or missing documentation or of course to inform them they're registered.

k) the process for dealing with documents provided in languages other than English or French

Applicants are informed through the methods indicated (website, information sheets, email or by calling the College), that they must provide both certified copies of the original documents and translations performed by a registered translator (in Ontario, the Association of Translators and Interpreters of Ontario - "ATIO"). Our materials provide detailed examples and explanations of what "certified" means and who can certify or translate documents including such recognized authorities as Consulates or Embassies (Canadian or of another country). Translations can also be performed by the originating source if that service is available. A University, for example, can provide a certified copy of a dental degree it awarded and a translation if it has the service.

l) the role of third-party organizations, such as qualification assessment agencies, organizations that conduct examinations or institutions that provide bridging programs, that applicants may come into contact with during the registration process

Our materials and the staff who communicate with candidates are clear and accurate in relaying that the College does not assess qualifications. The National Dental Examining Board of Canada ("NDEB") is the body vested by an Act of Parliament as being responsible for the establishment of qualifying conditions for a national standard of dental competence for general practitioners, for establishing and maintaining an examination facility to test for the national standard of dental competence and for issuing certificates to dentists who successfully meet this national standard. The NDEB through on-going in-depth investigation and analysis established the nationally accepted record of "Competencies for a Beginning Dental Practitioner in Canada". These facts are transparent and available on the NDEB website and the link provided in our fact

sheets.

The referenced "Competencies" are used to establish curriculums for full and degree completion programs, examination blueprints and accreditation standards for both Canada and the United States. We're proud to state that they have been used both nationally and internationally to establish processes not only in dentistry but in other professions as well. In short, they define the methods and mechanisms to be used to evaluate the competence of candidates. The four year dental programs, international degree completion programs and national examination assure that these competencies are being met by all practitioners whether Canadian or internationally trained. The RCDSO is of course a participatory member of the NDEB and has adopted these methods and mechanisms in partnership with the other Canadian (and American) DRA's. The NDEB conducts a psychometric analysis after each examination to ensure that its standards are current, accurate and reliable.

The RCDSO is also an active member of the Canadian Dental Regulatory Authorities Federation ("CDRAF"). The stated mandate of the Federation "is to provide leadership and a responsive infrastructure and forum where dental regulatory authorities in Canada can anticipate and respond, in effective and efficient ways, to current regulatory challenges on interprovincial, territorial, national and global levels." The CDRAF Executive meets several times a year and the full Board at least twice a year or more often if necessary so that issues, matters of concern or legislated changes are addressed as quickly as possible.

Respecting examinations, the College utilizes two national examiners, one for general practitioners and one for specialists. In each case the examination is "non-exemptible" in our regulation and therefore an important part of our process. Accordingly, we clearly have for the purpose of public protection an obligation to ensure that the examination provides the necessary comfort level that successful candidates are competent to practice. As reviewed at the beginning of this section, the National Dental Examining Board of Canada is responsible for the establishment of qualifying conditions for a national standard of dental competence for general practitioners, for establishing and maintaining an examination facility to test for the national standard of dental competence. The Royal College of Dentists of Canada ("RCDC") was similarly vested by an Act of Parliament in 1965 to: (a) promote high standards of specialization in the dental profession; (b) set up qualifications for and provide for the recognition and designation of properly trained dental specialists; (c) encourage the establishment of training programs in the dental specialties in Canadian schools. The NDEB and the RCDC are both named in Ontario's Registration Regulation and their role as examiners recognized. These facts are transparent and candidates clearly made aware of the role examiners play. They are accepted by the CDRAF as being our national examiners.

As reviewed in previous sections, the various Universities across Canada and the United States offer bridging/degree completion programs that give advanced standing to international candidates who qualify. These institutions are completely independent and have their own admissions process outside of our control.

All the referenced third party information is contained in our fact sheets with links to their websites containing more detailed information.

#### m) any timelines, deadlines or time limits that applicants will be subject to during the registration process

Due to the fact that all the requirements for registration must be met before candidates submit an application, there are no "deadlines" respecting when a candidate can submit an application to this College. Once submitted, applications are valid for three months and this fact is contained in our materials. Three months was deemed a reasonable time period given the fact that most candidates have already had months or even years to obtain the necessary documentation and requirements. Internationally trained applicants, for example, take the two-year bridging program. In addition, important information, e.g. practice standing, health etc. can change quickly and we need the information to be as current as possible therefore three months was considered reasonable. Similarly, letters of standing are only valid for three months if the person is still practicing in another jurisdiction. If the applicant has an older letter of standing, obtained for example when he/she left a jurisdiction or country of origin, and stopped practicing in that jurisdiction upon leaving then we

will accept letters of standing that are older than three months. Again, this information is fully elucidated in our materials and during any correspondence. To guarantee that the international students know what is required, we have asked the universities to inform candidates upon enrolment and a College representative also visits the University of Toronto and gives an information session during the students first year so that they have plenty of time to start obtaining the required documentation.

Another regulation clause that can affect registration is one which stipulates that there has been no three year period after obtaining a certificate of the NDEB that the applicant did not practice in a recognized jurisdiction, that being Canada or the United States. This proved necessary due to the broad differences in training and in practice standards that exist around the globe. If an applicant fell under this provision then he/she would be required to complete an assessment. This regulation too is spelled out in our fact sheet for general registration and of course contained in the Registration Regulation which is also on our website.

n) the amount of time that the registration process usually takes

Once an application is complete, which we have no control over, we state that processing a completed application takes three weeks or less, usually less than two weeks. Turn-a-round time is given in our fact sheets etc. including that it may vary depending on the time of year and other demands on the Registration Department (such as the membership renewal period). Timelines are monitored and investigated if a delay occurs.

o) information about all fees associated with registration, such as fees for initial application, exams and exam rewrites, course enrolment or issuance of licence

- Membership fees are pro-rated throughout the year for first time applicants. January 1 to May 31 \$1,760.00. June 1 to August 31 \$880.00. September 1 to December 31 \$530.00. Added to the membership fee are the one time application fee of \$250.00 and the Registration fee of \$100.00. The membership fee includes malpractice insurance which is an exclusive advantage that the RCDSO offers its members and results in substantial savings to them. This important information is of course clearly outlined in our materials.
- Jurisprudence and Ethics Course, a registration requirement, was moved to an on-line format in 2010. The course is now very user friendly and spare candidates taking two days of their time to attend. The course fee for many years of \$225.00 also no longer applies thus reducing the cost of registration for all applicants.
- The cost of bridging programs and examinations are transparently laid out in our Career Map for the internationally trained and updated for accuracy each year or when the information changes.

p) accommodation of applicants with special needs, such as visual impairment

Broadly speaking, a physically impaired person such as those with upper body paralysis or impaired vision would be unable to be accepted into dental school. If an unfortunate incident occurred after obtaining the dental degree then it would be judged on a case by case basis by the Registration Committee and/or by a special panel of experts that would be convened to look at what the applicant wishes to do and to make a determination as to whether an accommodation is possible. Such incidents are extremely rare and therefore not part of our standard information dissemination. Individuals in these cases are in tune with the fact that they have an unusual situation and contact us directly.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

There were no changes respecting the provision of information in 2010.

[BACK TO INDEX](#)

## Amount of Fees (2 / 13)

Are any of the fees different for internationally trained applicants? If yes, please explain.

The fees for registration with the College, including the membership fee, application fee and registration fee, are the same for all applicants. The fee for the national examination is the same for all applicants.

In 2010, internationally trained applicants had to complete the two-year bridging/Qualifying/Degree Completion program or the NDEB Equivalency Process which means paying University tuition fees or the assessment/examination fees. Program fees range from \$95,000 to \$156,000 total depending on the University. The same support services available to domestic university students, e.g. bank/student loans, grants, bursaries, are available to international applicants. These costs are not different from domestic attendees of the four-year programs and may or may not represent additional costs to the candidate. By this we mean that, many internationally trained individuals did not incur the expense of their original training since in many countries the Government pays for university education. The cost of the two-year program might therefore be new as opposed to "additional."

For candidates who paid their own tuition for their original training then the bridging program represents a necessary additional expense. We note that there is a growing trend for Canadian born candidates to take their training in other countries. As this training is not accredited, when we receive enquiries of this nature we advise everyone that they will face additional training and expense upon their return and strongly urge them to apply to Canadian or American accredited schools. This then becomes a matter of personal responsibility and pre-informed decision making.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

The membership fee did not increase. The application fee increased from \$100 to \$250.00. This increase was quite reasonable when you consider that our application fee and not increased in 20 years while the cost of administering the service certainly did.

The Jurisprudence and Ethics course moved to an on-line format and the \$250.00 course fee eliminated. Hidden savings are also possible due to the fact that it was quite common for individuals to travel from outside of Ontario to take the course thereby sustaining travel and hotel costs. The web course can be completed anywhere in the world for free.

## Provision of Timely Decisions, Responses and Reasons (3 / 13)

### a) What are your timelines for making registration decisions?

A "decision" can be interpreted in different ways including an initial review of the application that might then require further action on the part of the applicant. An application will be reviewed within 2 weeks or less of receipt. A final decision on whether to register the applicant will similarly take place within 2 weeks or less once the application is fully complete with all supporting documentation.

If there is a decision to refuse an applicant or to refer an application to the Registration Committee then our governing statute, the Regulated Health Professions Act, stipulates that the applicant must have 30 days to make submissions to the Committee. The Committee may make a decision the day of the meeting, in which case that decision will be given to the applicant within 1 week or less. The Committee may also, however, determine that it requires further information before making a decision. The panel meets approximately every two to three months or as necessary. The time required to obtain the requested additional information varies from case to case and what has been requested. The nature of additional information can vary from writing to a foreign jurisdiction, waiting for a disciplinary hearing to conclude in another jurisdiction, obtaining an expert opinion or arranging for a health assessment and report or for a clinical assessment if competency is in question.

These timelines are of course for those who have completed the registration requirements. They therefore do not take into account pre-application requirements and the time driven by our third party providers such as the University programs or those of the national examiners. As just stated, and reviewed elsewhere, a domestic student must complete a 4 year dental program and an internationally trained dentist a 2 year program or the alternative assessment path added in 2010. The national exam is offered in the final months of these programs and therefore in general does not add any time delay to the process. Those who fail the exam must re-sit it which necessarily adds time but can be completed within a couple of months.

### b) What are your timelines for responding to applicants in writing?

Two weeks or less respecting a review of the application. Typically a response to a specific question or situation occurs within 24-48 hours. When the candidate is actually registered then they are notified immediately by phone or email with the formal letter sent out the same day.

### c) What are your timelines for providing written reasons to applicants about all registration decisions, internal reviews and appeal decisions?

\*\*\* SAME AS LAST YEAR \*\*\*

Reasons are only provided if a candidate was reviewed by the Registration Committee and refused registration. Normal application decisions are issued in two weeks or less. If denied registration, Reasons are prepared, vetted by legal counsel and approved by the Registration Committee. This is a legal process typically expected to involve a future appeal of the decision and therefore must be properly crafted. Usual preparation time is 2 to 3 months.

d) Explain how your organization ensures that it adheres to these timelines.

All documents and applications are date stamped upon receipt. A physical file is created and the material is entered into both a manual tracking checklist and a system based case tracking tool. Applications are processed in turn according to the date received. Every action is entered into the system so that upon request, whether internal or from the applicant, we know the status of the application. There is a "bring forward" tool and another that records the expected outcome date or required response date on an action and the system will alert us. There are different sections of the Registration Department that administer the different aspects of the department, e.g. member registration, health profession corporation registration, sedation permits registration and so on. Nevertheless, all registration staff receives cross training so that if necessary, during sickness, vacation or peak periods, staff can quickly be reassigned to ensure deadlines are met.

The question of staffing needs is reviewed annually during the setting of the College budget. As well, the Supervisor and Manager monitor all functions of the department throughout the year. If the situation arose where we were unable to meet our timelines on an ongoing basis then it would be raised with the Directors and Registrar. Please also note that the three week timeline for normal applications would be the timeline at our busiest times of year. More typical would be one to two weeks.

Where an applicant has been denied registration and is referred to the Registration Committee, the panel meets approximately every three months which has proved to be effective with our particular case load. If necessary the panel can meet more often. It should nevertheless be recognized that considering the panel consists of 3 dentists, a government appointee and legal counsel, all of whom have busy schedules and other obligations, it is impossible to arrange a meeting on demand, however, all possible effort is always made to expedite these matters.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

[BACK TO INDEX](#)

## Access to Records (4 / 13)

a) Describe how you give applicants access to their own records related to their applications for registration.

\*\*\* SAME AS LAST YEAR \*\*\*

Most of the documentation received by the College would already be in the hands of the applicant and in most cases the applicant retains the original versions. It is rare therefore that someone would ask for a copy of their file. If an application is referred to the Registration Committee and documentation not in the possession of the applicant is received from other sources then the Regulated Health Professions Act clearly and simply spells out our responsibility to provide the applicant with copies of this documentation. Section 16(1) of the RHPA states: "The Registrar shall give an applicant for registration, at his or her request, all the information and a

copy of each document the College has that is relevant to the application." This is done automatically as material is received, a request is not necessary, and without any fees being charged. If for some reason additional copies are requested or something is lost, we ask that the request be in writing. Anyone other than the applicant requesting copies must provide a signed Release form from the applicant that names the individual as a designate, legal counsel or so forth. Copies of documentation are typically sent by courier. Where timing is an issue material may be scanned and sent by email.

b) Explain why access to applicants' own records would be limited or refused.

\*\*\* SAME AS LAST YEAR \*\*\*

Section 16(2) of the RHPA states that: "The Registrar may refuse to give an applicant anything that may, in the Registrar's opinion, jeopardize the safety of any person."

c) State how and when you give applicants estimates of the fees for making records available.

\*\*\* SAME AS LAST YEAR \*\*\*

The College does not charge a fee for providing copies of records and therefore estimates of the cost are not necessary.

d) List the fees for making records available.

\*\*\* SAME AS LAST YEAR \*\*\*

The College does not charge a fee for providing copies of records. Even in an appeal process when the pages of documentation before a panel may run into the thousands and multiple copies are necessary we do not charge for copies of records.

e) Describe the circumstances under which payment of the fees for making records available would be waived or would have been waived.

\*\*\* SAME AS LAST YEAR \*\*\*

The College does not charge a fee for providing copies of records and therefore there is nothing to waive.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

**Resources for Applicants (5 / 13)**

a) List and describe any resources that are available to applicants, such as application guides, exam blueprints or programs for orientation to the profession.

Applicants can access:

1. As reviewed in section 1, the College information/fact sheets available on our website and upon request via mail or email. They list all the requirements for registration, time frames, third party contact information, a list of fees and an FAQ section.
2. An Ontario Immigration approved "Career Map" is available on the RCDSO website and various government websites.
3. Information about the degree completion programs and the national examinations including exam blueprints, exam sample questions, suggested reading, dates, fees etc. are available on the examination bodies (NDEB, RCDC) websites.
4. The National Dental Examining Board website has a self assessment tool that applicants can access from anywhere in the world. It allows them to gage how their level of training might compare to Canadian standards and give insight respecting their chances of entering the bridging programs.
5. The NDEB website also developed and lists "Competencies for the Beginning Dental Practitioner in Canada." Universities throughout Canada and the United States use these expected competencies to develop accredited programs including the bridging programs. It's another useful tool for candidates to examine and compare their training to that of Canadian graduates.
6. The Access Centre of HealthForceOntario offers the internationally trained registration information and links to our website, counselling and support as well as suggestions if a career change is deemed practical.
7. Registration staff is available by phone or in person to assist with applications or clarify paths to registration.
8. In 2010 the College's Ethics and Jurisprudence course moved to an on-line format and provides a broad orientation to the profession and to Ontario's regulations (laws) respecting the practice of the profession.

b) Describe how your organization provides information to applicants about these resources.

\*\*\* SAME AS LAST YEAR \*\*\*

See "a)" above - websites, email, mail, phone, in person.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

In 2010 the College's Ethics and Jurisprudence course moved to an on-line format and provides a broad orientation to the profession and to Ontario's regulations (laws) respecting the practice of the profession.

### Internal Review or Appeal Processes (6 / 13)

In this section, describe your internal review or appeal process. Some regulatory bodies use these two terms (*internal review* and *appeal*) for two different processes, some use only one of these terms, and some use them interchangeably. Please use the term that applies to your profession. If you use both terms (for two different processes), please address both.

a) List your timelines for completing internal reviews or appeals of registration decisions.

An "appeal" is a legal term involving a judicial authority or government appointed body. An applicant can file an appeal to a Civil Court for example. Accordingly, the College conducts internal reviews. If an applicant is unhappy with the decision of the Registration Committee then he/she can "appeal" the decision to the Health Professions Appeal and Review Board.

Based on the number of requests, i.e. the Agenda, the Registration Committee meets approximately every two to three months and the "timeline" therefore depends on when an application requiring a review of the Registrar's decision is submitted. This situation is carefully monitored and if an applicant expresses the need to expedite the review then all effort will be made to do so including having a conference call rather than a physical meeting. Section 15(3) of the RHPA states: "If the Registrar refers an application to the Registration Committee, he or she shall give the applicant notice of the statutory grounds for the referral and of the applicant's right to make written submissions under subsection 18(1)." The Act also requires us to give applicants 30 days to make their written submission. An applicant can sign a Waiver to proceed without the 30 days accommodation if the Committee is meeting in less than 30 days and the applicant wishes to proceed. Although not required by the RHPA, the College as a matter of policy invites all applicants to attend the Registration Committee meeting.

Once the Committee has issued a decision it goes out in less than a week. The "Reasons" for the decision, required by the RHPA, and notice of right of appeal typically takes two to three months.

i. State the number of internal reviews or appeals of registration decisions that exceeded your timelines.

\*\*\* SAME AS LAST YEAR \*\*\*

There were no cases where a referral for a review exceeded College timelines.

ii. Among internal reviews or appeals that exceeded your timelines, state the number that were from internationally trained applicants.

\*\*\* SAME AS LAST YEAR \*\*\*

There were no cases exceeding College timelines.

b) Specify the opportunities you provide for applicants to make submissions regarding internal reviews or appeals.

As stated in section "a)", the RHPA requires that applicants have 30 days to submit a written submission. Under our own policy applicants are also always invited to attend with the panel to make oral submissions.

c) Explain how you inform applicants about the form in which they must make their submissions (i.e., orally, in writing or by electronic means) for internal reviews or appeals.

The RHPA requires that we send formal written Notice of the referral to applicants. This means mailing the notice but to expedite matters we will often send it by courier as well and if time is of the essence we scan and email it. Moreover, due to the ongoing contact between an applicant and the College the applicant in most cases has been verbally informed very early on in the process that a referral would be forthcoming.

There is no special "form" that the applicant must complete in order to request an appeal or documents, forms etc. to complete respecting their submission(s) in support of their appeal. Applicants are provided up front with notice that a referral to the Registration Committee has taken place. We then ask that they confirm in writing whether or not they will be submitting documentation to support their position and that they will or will not be attending the meeting. All applicants are invited to attend. Such notice can be personally delivered, mailed or emailed. The person is free to type or hand write a personal statement and explanation or they can hire a lawyer who might submit the submission in a very formal/legal fashion. Applicants are free to bring anyone they wish, this could be a lawyer, an 'expert' chosen by them, a translator and sometimes it's just a friend for moral support.

In cases where the applicant's request has been refused by the Registration Committee then the next level of appeal is to the Health Professions Appeal and Review Board (see "e" in this section for an elaboration of this process). In these circumstances, the Board requires written notification from the applicant as to whether he/she wishes a paper Review or a full Hearing and there are specific timelines dictated by the Board as to when this is to happen. Applicants are fully informed of the process, timelines, the Board's address, their appeal rights and so forth when the Committee's decision is sent. Decisions are typically sent within one week of the decision being rendered.

d) State how you ensure that no one who acted as a decision-maker in a registration decision acts as a decision-maker in an internal review or appeal of the same registration decision.

The Registrar makes the initial decision to refer or proposal to refuse. He is not permitted to interact or intervene with panel members respecting an applicant once he/she has been referred to the Registration Committee. The Registrar does not attend Committee meetings involving applications. The only time he would attend would be in cases where policy or regulation matters were being discussed and his input was thought prudent. The Registration Committee is an independent Statutory panel of Council members, including a government appointed public member, receiving its authority from the RHPA and not from the College's Council or Registrar.

e) Describe your internal review or appeal process.

As stated, the RHPA mandates all health Colleges to have an appeals process and the required steps. Apart

from what is prescribed, the right of review is an ingrained part of the College's corporate philosophy. If an applicant is refused by the Registrar or the Registrar has concerns about whether an applicant meets the legislated requirements for registration then the applicant is referred to the Registration Committee. No member of the Committee was involved in the original decision and the Registrar is not permitted to be involved in a case once the matter is referred to the Committee.

The Regulated Health Professions Act has a Procedural Code that establishes the procedures to be used by the Registration Committee. Committee panels are instructed respecting how to conduct a proceeding in a fair and unbiased manner and receive clear information about confidentiality, the College's Code of Conduct, and the issue of bias whether real or perceived. Members are expected to remove him/herself from an applicant's case if they feel there might be bias, good or bad, real or perceived. In the same vein, all applicants are invited to declare if they object to any panel member determining their case and if so then the member will be removed and replaced if necessary.

The RHPA requires that applicants are given notice of a referral to the Registration Committee and that they have 30 days to make a written (including electronic) submission. The Registration Committee meets approximately every two to three months. Accordingly, it depends on when an application is received as to how long an applicant must wait, i.e. 2 weeks, 6 weeks, 10 weeks. We will always try our best to accommodate the applicant's timelines. In a situation where the Committee is meeting before 30 days has elapsed, for example, the applicant will be given the choice as to whether he/she wishes to expedite their application by waiving their right to have 30 days and have the panel proceed with the review. If the matter is urgent we will also attempt to arrange a conference call meeting with the panel. In addition, the College has always believed in the efficacy of allowing applicants to attend with the panel in order to state their case in person. This also tends to expedite the proceeding should the panel have any questions for the applicant.

Under Section 16(1) of the RHPA (Code), the Registrar is required to give the applicant all the information and a copy of each document the College has that is relevant to the application. We do this automatically without requiring a request and at no cost to the applicant. When an application is complete, it is added to the Agenda for consideration by the Registration Committee at its next scheduled meeting.

As per Section 18(2) of the RHPA, the Registration Committee, after considering an application, may make an Order doing any one or more of the following:

1. Directing the Registrar to issue a certificate of registration.
2. Directing the Registrar to issue a certificate if the applicant successfully completes examinations set or approved by the panel.
3. Directing the Registrar to issue a certificate of registration if the applicant successfully completes additional training specified by the panel.
4. Directing the Registrar to impose specified terms, conditions and limitations on a certificate of registration of the applicant.
5. Directing the Registrar to refuse to issue a certificate of registration.

Additionally, the Registration Committee may, with the consent of the applicant, direct the Registrar to issue a certificate of registration with terms, conditions and limitations.

Decisions of the panel are certainly given within a "reasonable time" period as they are typically sent within a week of the decision and more often than not within a couple of days. The Health Professions Procedural Code outlines the opportunity for applicants who disagree with the Committee decision to appeal that decision to the Health Professions Appeal and Review Board. This is an independent government body and no member of the Registration Committee is involved in its review or decision.

f ) State the composition of the committee that makes decisions about registration, which may be called a Registration Committee or Appeals Committee: how many members does the committee have; how many committee members are members of the profession in Ontario; and how many committee members are internationally trained members of the profession in Ontario.

The Registration Committee consists of 4 members, three elected members of Council who are dentists and one public member appointed by government. The number of internationally trained on any panel, Registration or otherwise, is random as it is not a requirement to be elected to Council or one to be a public member. Having said that, the Registration Committee has historically always had one or more members who were internationally trained, both dental practitioners and public members. The public member sitting on the 2010 Registration Committee was internationally trained.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

[BACK TO INDEX](#)

### Information on Appeal Rights (7 / 13)

This section refers to reviews or appeals that are available after an internal review or appeal. Describe how you inform applicants of any rights they have to request a further review of or appeal from a decision.

\*\*\* SAME AS LAST YEAR \*\*\*

Once more the RHPA dictates, in this case the appeals process. If the Registration Committee refuses to register an applicant then he/she is referred to the Health Professions Appeal and Review Board . The Committee is not involved in the independent decision making process of the Board. When a decision to refuse is given to the applicant in writing it always includes the applicant's right to a further appeal to HPARB along with instructions on how to proceed. When Reasons for the decision are sent the package also includes "Notice" of the appeals procedure, who to contact, amount of legislated time allowed and so forth. The RHPA also stipulates that applicants must be given every document that the Registration Committee had and on which it based its decision.

The Board has the authority to:

- a) Confirm the order made by the Registration Committee.
- b) Require the Committee to make an order directing the Registrar to issue a certificate of registration to the applicant if the applicant successfully completes any examination or training the Registration Committee may specify.
- c) Require the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant and to impose any terms, conditions and limitations the Board considers appropriate.
- d) Refer the matter back to the Registration Committee for further consideration by a panel, together with any recommendations the Board considers appropriate.

Limitation on order - The Board, in making an order shall not require the Registration Committee to direct the Registrar to issue a certificate of registration to an applicant who does not meet a registration requirement that

is prescribed as a “non-exemptible” requirement.

The Board gives its decision and reasons in writing to the applicant and to the College. The decisions of the Board are typically issued several months after the date of the review.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

[BACK TO INDEX](#)

### **Assessment of Qualifications (8 / 13)**

This category covers your processes for assessing all qualifications, such as academic credentials, competencies, language ability or practical experience.

a) List the criteria that must be met in order for an applicant’s qualifications to satisfy the entry-to-practice requirements for your profession.

As per our provincial regulation and national agreement on requirements, this College does not "assess" qualifications, academic credentials, competencies or practical experience. This function is performed by the Association of Canadian Faculties of Dentistry, the Universities, the National Dental Examining Board of Canada and the Royal College of Dentists of Canada. The requirements for registration are as follows:

There are several different classes of certificate of registration, each having specific requirements for that class. Each class of certificate, therefore, has its own requirements. The following are the basic requirements for a general certificate of registration, the most common form of certificate/license and the one which permits the broadest scope of practice in the public domain.

1. The applicant has a degree in dentistry evidencing successful completion of a course in dental studies of at least four years' duration at a university based dental school.
2. The applicant, (i) holds a certificate of the National Dental Examining Board of Canada (“NDEB”) issued before January 1, 1994, or (ii) has successfully completed the National Dental Examining Board examinations leading to a certificate of the National Dental Examining Board at a time when those examinations were approved by the College, or (iii) satisfies the Registration Committee that he or she, a) has possessed a non-restricted status with regard to the general practice of dentistry in the United States of America for a period of more than seven years, and b) has successfully completed a qualifying examination to test the applicant's knowledge, judgment and clinical competence in general dentistry that was set or approved by the Registration Committee at the time the applicant took it. Graduates of non-accredited (international) dental programs must first successfully complete a two-year qualifying program at a Canadian or American university OR successfully complete the “NDEB Equivalency Process” before they will be permitted to challenge the NDEB examination.
3. Since being issued the National Dental Examining Board certificate or since completing the qualifying examination stated in 2(iii) or since obtaining a licence that allows you to practice independently and without restriction in Canada, there has been no three-year period during which the applicant has not engaged in the practise of dentistry on a continuous and regular basis in Canada or the United States of America.
4. The applicant is reasonably fluent in either English or French.
5. The applicant has successfully completed the examination in ethics and jurisprudence.
6. The applicant is a Canadian citizen or a permanent resident of Canada or has received the appropriate authorization under the Immigration and Refugee Protection Act (Canada) to permit the applicant to engage in

the practise of dentistry in Canada.

7. Where the applicant is or has been registered/licensed to practise dentistry in another jurisdiction, or has engaged in the practice of dentistry anywhere in the world, the applicant is not and has not been suspended or the subject of a finding of professional misconduct, incompetence or incapacity.

8. The applicant has paid all of the prescribed fees.

See Section 9 for a fuller response of how our 3rd party assessors perform their functions.

b) Describe the methodology used to determine whether a program completed outside of Canada satisfies the requirements for registration.

Dentistry has always been proactive in striving to balance the issue of public protection while utilizing the most fair, efficient and effective processes possible within the limitations of available funding and facilities. Seeking a national consensus on the subject was the only option and dentistry again proved to be very forward thinking in this approach, way ahead of the fragmented American system and before the European Union was formed. Prior to labour mobility being mandated, the profession had national consensus respecting registration requirements, an established list of required competencies that a practicing dentist must have and a national examining body. When the issue of labour mobility first appeared the profession signed a formal mobility agreement. When labour mobility became a legislated requirement, both federally and provincially, the Dental Regulatory Authorities ("DRA's") renewed and improved the national Mutual Recognition Agreement in the fall of 2009.

Through various means including annual monitoring of admissions tests, performance in the advanced standing programs (bridging process) and results from the national examination, it had been demonstrated that the majority of international candidates required the two year bridging programs in order to meet Canadian standards. This also meant that some did not and so the DRA's in the 2009 MRA finalized a project of creating a streamlined assessment protocol to work alongside the existing bridging programs. Accordingly, there are now four methods to determine whether an international undergraduate program, and of course the candidate, is considered equivalent to a graduate of a dental program approved by the Commission on Dental Accreditation of Canada ("CDAC").

The first method is to determine whether the program completed outside of Canada is approved in that jurisdiction by a valid and defensible accreditation process that has been determined to be equivalent to the CDAC accreditation process. As a result of having been deemed equivalent, a bilateral reciprocal recognition agreement between the CDAC and the organization responsible for accreditation of dental programs in the jurisdiction will be made. One example of this is the reciprocal agreement that has existed for some time with the United States equivalent of the CDAC, the American Commission on Dental Accreditation (CODA).

As requested by the provincial DRA's and the National Dental Examining Board, over the past five years the CDAC has contacted numerous international dental regulatory authorities to inquire if an accreditation process similar to the CDAC process exists in their jurisdiction. In 2010, as a result of these contacts, a reciprocal agreement was implemented with the Australian Dental Council. Negotiations are currently underway to establish a reciprocal agreement with New Zealand. Preliminary discussions have been held with Hong Kong and the United Kingdom. Assistance with the development and implementation of an accreditation process is being provided to Korea.

The second method of assessing programs completed outside of Canada is a similar process to the one described above but originating out of the United States through CODA. CODA has established its own accreditation procedure for international dental programs that can be initiated at the request of the international dental program and with associated costs covered by the dental program. This process accredits international dental programs using the U.S. standards as the basis for the approval. With the Canadian/American reciprocal agreement in place, the NDEB (and therefore the RCDSO) will recognize graduates of international programs approved by CODA as graduates of approved programs.

Graduates of undergraduate dental programs approved under these reciprocal agreements are considered equivalent to graduates approved by the CDAC and are therefore eligible to take the NDEB certification examination.

The third method for determining whether a graduate of an international undergraduate dental program is equivalent to a graduate of an approved program is for the candidate to complete a bridging program also known as a Qualifying/Degree Completion Program. There are over 70 Universities throughout Canada and the United States where this method can be accessed.

In 2010 the NDEB began processing applications for the fourth method used to determine whether a program completed outside of Canada, or more fittingly the candidate, satisfies the requirements for registration. Graduates of non-accredited dental programs are eligible to participate in the new "NDEB Equivalency Process". An individual who successfully completes this four day assessment will be considered equivalent to a graduate of an undergraduate dental program approved by the CDAC and therefore eligible to take the NDEB certification examination. Individuals who are not successful in the NDEB Equivalency Process are still eligible to apply for admission to a Qualifying/Degree Completion Program using the Equivalency Process results as the admission test with no other admission tests required.

c) Explain how work experience in the profession is assessed.

We do not have a work experience requirement and given the differences in training on the international stage and the differences in standards of practice, work experience does not play a large role in the assessment process.

d) Describe how your organization ensures that information used in the assessment about educational systems and credentials of applicants from outside Canada is current and accurate.

As stated above, the RCDSO through the NDEB and the CDAC are in contact with international dental regulatory authorities and regularly attend international conferences and workshops on education and registration, make invited presentations, and provide consultation to international regulatory boards. Through these consultations, the RCDSO, NDEB Board, and CDAC have been able to confirm the status of many international dental programs and accreditation processes or lack of these processes.

In 2010, the NDEB has performed credential verification (not credential assessment) of documents for over 1100 applicants. While detection of fraudulent documentation was done successfully it is absolutely impossible to distinguish any differences between programs based on a paper review. Paper reviews may work for some professions but not, in our view, for a health profession such as dentistry. No organization has the ability to determine equivalency based solely on transcripts, program descriptions and similar material, has the expertise or is capable of performing or obtaining the kind of information that dentistry's accreditation system performs. They can't find out minimum admission requirements, number of full-time faculty with dental degrees or the faculties qualifications, hours of treating patients in a university based clinic (or whether it is University based or just an apprenticeship type situation at a local doctor's office or less) or, and this is often a problem, the legitimate differences between educational levels such as a countries high school diploma being equivalent to our grade 9 or 10. These are but small examples of what goes into a much larger and necessary accreditation review. This doesn't even touch upon the necessity for clinical evaluation which of course a paper based system can't perform. A paper review provides no relationship to equivalency relative to standards but simply produces a conclusion based on a comparison of years of study. Such assumptions are not valid and in fact are dangerous.

e) Describe how previous assessment decisions are used to assist in maintaining consistency when assessing credentials of applicants from the same jurisdictions or institutions.

While an assessment of an institution is relevant, even the Canadian and American schools are re-assessed on a regular basis. It must be said again that we are not registering an institution to practice on the public but an individual. Individual competencies fluctuate tremendously even within the same program given in the same year. This is one reason even candidates from accredited Canadian programs must complete our national examination.

As described earlier, the Universities have many years of experience teaching and evaluating international graduates during Qualifying/Degree Completion Programs. The Universities have reported that with very few exceptions, the participants required significant upgrading to reach acceptable standards. Having said this, we now have another source of potential information in the new NDEB Equivalency Process. An analysis of performances by country of graduation will be performed while processing these candidates to see if any modifications can be made to the protocol.

f) Explain how the status of an institution in its home country affects recognition of the credentials of applicants by your organization.

An applicant who is a graduate of an international dental program is eligible to participate in the NDEB Equivalency Process provided that their institution was recognized by the government in the country.

g) Describe how your organization accommodates applicants with special needs, such as visual impairment.

Broadly speaking, a physically impaired person such as those with upper body paralysis or impaired vision would be unable to be accepted into dental school. If an unfortunate incident occurred after obtaining the dental degree then it would be judged on a case by case basis by the Registration Committee and/or by a special panel of experts that would be convened to look at what the applicant wishes to do and to make a determination as to whether an accommodation is possible. We have registered individuals who demonstrated that even with the loss of a finger they could still perform competently. Another example would be someone who could no longer engage in clinical practice but was capable of conducting research.

A different kind of special need may be defined under the various blood born pathogens. Some are more clinically manageable than others and again would be reviewed on a case by case basis.

We and the other institutions listed are wheel chair accessible where that might be the disability. Accommodations can also be made in the case of a religious special need. Examinations scheduled on Saturdays, for example, can be offered on a Friday where a religious conflict exists.

h) State the average length of time required to complete the entire registration process, from when the process is initiated to when a registration decision is issued.

As reviewed earlier, once an applicant has successfully completed all of the requirements and provided a complete application form with supporting documentation then processing time is two weeks or less. If "the entire registration process" includes pre-registration requirements that are not part of our processes or

responsibility then add four years for the North American undergraduate dental programs. For the internationally trained candidate, he/she would need to complete the two-year advance standing/degree completion program (bridging process) where required or the nine month NDEB Equivalency Process.

i. State whether the average time differs for internationally trained individuals.

Again, if this includes meeting the pre-College requirements then internationally trained individuals may have to complete the two year bridging/Qualifying/Degree completion program. The new NDEB Equivalency Process takes approximately nine months but as mentioned only requires a few days of the candidate's actual time.

ii. If the average time differs for internationally trained individuals, state whether it is greater or less than the average for all applicants, and the reasons for the difference.

There is no difference in processing time once an application has been filed with the College. If the question includes pre-application requirements then Canada and U.S. graduates must complete the four-year dental program and internationally trained individuals must complete either the two-year advanced standing/bridging programs or nine month NDEB Equivalency Process due to the differences between international dental programs and Canadian/U.S. accredited programs as described throughout this questionnaire.

i) If your organization conducts credential assessments:

i. Explain how you determine the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

We do not conduct credential assessments. See Section 9 on third party providers.

ii. Describe the criteria that are applied to determine equivalency.

We do not conduct credential assessments. See Section 9 on third party providers.

iii. Explain how work experience is taken into account.

We do not conduct credential assessments. See Section 9 on third party providers.

j) If your organization conducts competency assessment:

i. Describe the methodology used to evaluate competency.

We do not conduct competency assessments. As agreed to by all the Canadian Dental Regulatory Authorities in the Mutual Recognition Agreement in order to implement labour mobility under the Agreement on Internal Trade, the RCDSO uses the NDEB to provide assessments of competency for all registrants. The NDEB was established in 1952 at the request of the Provinces by an Act of Parliament and its Board Members are

appointed by the Provincial Dental Regulatory Authorities. Detailed information and a full explanation of the methodologies used can be obtained from section 8b and in section 9d on third party providers and directly from the NDEB website at [www.ndeb.ca](http://www.ndeb.ca).

ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

We do not conduct credential assessments. See Section 9 on third party providers.

iii. Explain how work experience is used in the assessment of competency.

\*\*\* SAME AS LAST YEAR \*\*\*

We do not evaluate competency. See Section 9 on our third party providers.

k) If your organization conducts prior learning assessment:

i. Describe the methodology used to evaluate prior learning.

We do not conduct prior learning assessments. See Section 9 on third party providers.

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

We do not conduct prior learning assessments. See Section 9 on third party providers.

iii. Explain how work experience is used in the assessment of prior learning.

We do not conduct prior learning assessments. See Section 9 on third party providers.

l) If your organization administers examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

We do not conduct examinations. See Section 9 on third party providers.

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

We do not conduct examinations. See Section 9 on third party providers.

iii. State how often exam questions are updated and the process for doing so.

We do not conduct examinations. See Section 9 on third party providers.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

See section 9 on third party providers.

[BACK TO INDEX](#)

### Third-Party Organizations (9 / 13)

a) List any third-party organizations (such as language testers, credential assessors or examiners) relied upon by your organization to make assessment decisions.

\*\*\* SAME AS LAST YEAR \*\*\*

The following Universities in Canada offer advanced standing/degree completion programs (otherwise known as bridging programs):

Dalhousie, Laval, McGill, Alberta, British Columbia, Manitoba, Montreal, Saskatchewan plus Toronto and Western in Ontario. This service is also offered in the United States through any University that has a dental program. In total, approximately 70 Universities offer these programs in North America.

It must be recognized that Universities throughout the world prize one thing above all others and that is their independence. The Ontario schools have partnered with us and been supportive and cooperative but must operate within the limitations of their budgets, facilities, staffing and so forth.

The Association of Canadian Faculties of Dentistry (ACFD) and the National Dental Examining Board of Canada (NDEB) perform credential reviews and admissions tests. World Education Services also assist with credential reviews. The NDEB is the national examining body for general dentists. The Royal College of Dentists of Canada is the national examining body for dental specialists. The Commission on Dental Accreditation of Canada (CDAC) and the American Dental Association (ADA) perform accreditation assessments and site visits of dental programs in Canada and the United States.

We accept standard, recognized language assessors such as TOEFL and IELTS.

b) Explain what measures your organization takes to ensure that any third-party organization that it relies upon to make an assessment:

i. provides information about assessment practices to applicants

\*\*\* SAME AS LAST YEAR \*\*\*

All of the providers listed above have information packages and websites that are transparent and informative on all issues including times, dates, costs, admissions requirements, formats, program descriptions, examinations, sample exam questions, suggested topics for study, by-laws and government appointed authority and appeal processes. There are various means by which we ensure information on assessment practices is available to applicants and that they are operating in a transparent, objective, impartial and fair manner:

1) We have ongoing contact with the two Ontario Universities, the NDEB, RCDC and the Canadian Dental Regulatory Authorities Federation (CDRAF) on a variety of topics. Contact could be weekly or monthly depending on what's occurring.

The Ontario Universities through the ACFD meet with the other Universities in Canada and the United States.

2) Our College Council, which is our governing body, has a representative from each Ontario school. It should be noted, however, that we cannot control these independent institutions or the numerous Universities throughout the United States which all feed into our system of accredited training, including that for the internationally trained. We strive to keep lines of communication open and maintain good will.

3) The NDEB, RCDC, ACFD and CDAC meet with the CDRAF several times a year to report on the progress of requested projects, discuss problems as well as what's working, provide statistics and generally review processes.

4) Every Canadian Dental Regulatory Authority has representation on the Board of the NDEB and therefore there is direct monitoring and guidance. The Commission on Dental Accreditation also sits on the NDEB Board. This College receives an annual report from the NDEB.

5) The RCDC has two representatives on its Council from the CDAC and two from the dental regulatory authorities. It must also be noted that both the NDEB and RCDC are answerable to the country and not just this province. Both organizations were created by their own Acts of Parliament and have their own levels of bureaucracy and approval mechanisms that must be honoured.

6) We monitor the websites of these organizations and bring potential problems to their attention.

ii. utilizes current and accurate information about qualifications from outside Canada

As stated above, the RCDSO through the NDEB and the CDAC are in contact with international dental regulatory authorities and regularly attend international conferences and workshops on education and registration, make invited presentations, and provide consultation to international regulatory boards. Through these consultations, the RCDSO, NDEB Board, and CDAC have been able to confirm the status of many international dental programs and accreditation processes or lack of these processes. It has also been possible to identify jurisdictions where the dental education process is so different that there is no comparability. Where information is known it supports the contention that, at least for those countries that currently provide the major applicant pool, training is insufficient and does not meet Canadian/U.S. standards of practice. Information gleaned from admissions applications, examinations and performance reviews in bridging programs supports this conclusion as well. For those few who can demonstrate that they don't require the two year bridging program, 2010 saw the implementation of a second stream, fast tracked process, the NDEB Equivalency Process.

For those schools and programs that we have not been able to establish contact with then information

concerning the intimate details of the content and deliverables of international dental programs is not known and/or often inaccurate, anecdotal or biased. In a health profession such as dentistry, paper reviews reveal very little. Countries throughout the world are having the same difficulties trying to assess qualifications obtained outside their jurisdictions. Australia has called on us to help them with their examination and to forge an alliance. The European Union has recognized as we do that training in Europe is anything but uniform and they have asked the Universities throughout Europe to work voluntarily to harmonize dental curriculums. This will take a very long time. Moreover, without a firm template and timelines being imposed it becomes a question as to how successful this initiative will be. Meanwhile, actual mobility numbers in the EU are far below what was expected because jurisdictions continue to have problems recognizing "foreign" worker's credentials. In short, there is no valid method of assessing information about international dental qualifications other than those that we employ as discussed in detail sections 8b & 8d.

### iii. provides timely decisions, responses and reasons to applicants

\*\*\* SAME AS LAST YEAR \*\*\*

All of the providers listed above have information packages and websites that are transparent and informative. There are various means by which we ensure the third parties provide timely decisions, responses and reasons to applicants:

- 1) We have ongoing contact with the two Ontario Universities, the NDEB, RCDC and the Canadian Dental Regulatory Authorities Federation (CDRAF) on a variety of topics. Contact could be weekly or monthly depending on what's occurring. The Ontario Universities through the ACFD meet with the other Universities in Canada and the United States.
- 2) Our College Council, which is our governing body, has a representative from each Ontario school. It should be noted, however, that we cannot control these independent institutions or the numerous Universities throughout the United States which all feed into our system of accredited training, including that for the internationally trained. We strive to keep lines of communication open and maintain good will.
- 3) The NDEB, RCDC, ACFD and CDAC meet with the CDRAF several times a year to report on the progress of requested projects, discuss problems as well as what's working, provide statistics and generally review processes.
- 4) Every Canadian Dental Regulatory Authority has representation on the Board of the NDEB and therefore there is direct monitoring and guidance. The Commission on Dental Accreditation also sits on the NDEB Board. This College receives an annual report from the NDEB.
- 5) The RCDC has two representatives on its Council from the CDAC and two from the dental regulatory authorities. It must also be noted that both the NDEB and RCDC are answerable to the country and not just this province. Both organizations were created by their own Acts of Parliament and have their own levels of bureaucracy and approval mechanisms that must be honoured.
- 6) We monitor the websites of these organizations and bring potential problems to their attention.

### iv. provides training to individuals assessing qualifications

\*\*\* SAME AS LAST YEAR \*\*\*

We are not the experts in these fields and therefore rely upon third party providers in order to ensure the best possible service and outcomes. Accordingly, "training" is not something we do and the term seems slightly out

of place here since we only enter into partnerships with those who have the appropriate and necessary training to begin with. The many third party providers involved utilize the talents of trained educated researchers, professors, credential assessors, statisticians and psychometricians (experts in examination development and reviews).

v. provides access to records related to the assessment to applicants

\*\*\* SAME AS LAST YEAR \*\*\*

Typically it is the applicant who provides all the documents for assessment. If the reference includes providing applicants who failed an examination with copies of that examination then no examiner is prepared to do that. Safeguarding the integrity of exam questions is extremely difficult. As it is many questions are being "blueprinted" and ending up on the internet. Exam question development is extremely costly and all precaution must be taken to protect the validity and reliability of the exam process. Examiners in most professions I can think of will not release questions to failed candidates but will simply provide a broad response, if possible, of where the candidate was weak.

Respecting general dentistry, of equal significance is the fact that the NDEB and ACFD examinations are a sampling of an individual's knowledge and clinical judgement across the complete discipline of dentistry. The examinations are therefore designed to provide an overall result but there are too few questions in sub-disciplines (such as endodontics or periodontics) to make reliable judgement or feedback on sub-disciplines. At least 30 questions in each sub-discipline would be required in order to be able to provided reliable feedback on performance in sub-disciplines. This would mean much longer and more expensive examinations which neither the regulatory bodies nor the candidates wish to see.

In respect of the specialty disciplines of dentistry, the national specialty examiner, the RCDC, provide candidates who fail with a "Report of Weakness". This report is based on blueprinted content and gives the candidate feedback on how well he/she performed on each topic covered in the examination. For example, in the specialty of Periodontics there are sixteen separate content areas in the report. Candidates receive a report indicating the topics in which they did not perform at a passing level. The topics defined for each specialty is on the RCDC website.

vi. accommodates applicants with special needs, such as visual impairment

\*\*\* SAME AS LAST YEAR \*\*\*

As previously stated, where a physical impairment is the issue such as someone who is paralyzed in the upper limbs or visually impaired, it's unlikely that he/she would be accepted into dental school. Like this College, however, Universities will convene special panels or Committees to look at candidates specific special needs and will make all effort to accommodate those needs where possible. Not all special needs are associated with physical impairment, one example being that examination bodies make accommodations in the case of a religious special need. Examinations scheduled for Saturdays (which is quite common) will be offered on a Friday where a religious conflict exists.

c) If your organization relies on a third party to conduct credential assessments:

i. Explain how the third party determines the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

Applicants for the bridging programs or equivalency assessment must first have their credentials verified and

are required to submit the following documents:

Photocopies of dental diploma(s)/degree(s) in the language issued bearing the original seal and signature of a Notary Public or Commissioner of Oaths in English or French.

An original certified translation of dental diploma(s)/degree(s) into English or French. Translations must be certified by an accredited translator from a professional association of translators, or photocopies of certified translations bearing the original seal and signature of a Notary Public or Commissioner of Oaths in English or French.

A photocopy of any internship certificate or equivalent if applicable to the requirements of the dental faculty or school attended in the language issued bearing the original seal and signature of a Notary Public or a Commissioner of Oaths in English or French.

An original certified translation of any internship certificate or equivalent required into English or French, or photocopies of certified translations bearing the original seal and signature of a Notary Public or Commissioner of Oaths in English or French.

An official transcript or an original notarized copy, bearing the original seal and signature of a Notary Public or Commissioner of Oaths in English or French, of the transcript of the applicant's record from all dental schools or faculties attended stating the results obtained throughout all years of the course in the language issued.

An original certified translation into English or French of the transcript of the applicant's record from all dental schools or faculties attended stating the results obtained throughout all years of the course, or photocopies of certified translations in to English or French bearing the original seal and signature of a Notary Public or a Commissioner of Oaths in English or French.

Applicants seeking to be registered as dental specialists must complete the Dental Specialty Core Knowledge Examination (DSCKE) and must include documents from both their DDS/DMD program and specialty program.

When the NDEB receives the documents from an applicant, they review each document for consistency in names, dates etc. They verify that the transcripts for four academic years are provided and the institution that awarded the degree does in fact offer a dental program.

As reviewed in section 8d, the Canadian dental regulators and the national examiners do not believe that credential assessments can be successfully performed based on paper reviews. To repeat, in 2010, the NDEB performed over 1100 credential verifications. While detection of fraudulent documentation was done successfully it was absolutely impossible to distinguish any differences between programs based on a paper review. Paper reviews may work for some professions but not, in our view, in a health profession like dentistry. No organization has the ability to determine equivalency to a graduate of an accredited dental program based solely on a paper review of transcripts, course outlines and the like. They do not have the expertise nor capable of performing or obtaining the kind of information that dentistry's accreditation system performs. Paper does not reveal the minimum admission requirements that a school utilized, the number of full-time faculty with dental degrees or the faculties qualifications, the hours of treating patients in a university based clinic (or whether it is University based or just an apprenticeship type situation at a local doctor's office or less) or, and this is often a problem, the legitimate differences between educational levels, for example, some country's high school diplomas are equivalent to our grade 9 or 10. These are but small examples of what goes into a much larger and necessary accreditation review. This doesn't even touch upon the necessity for clinical evaluation which of course a paper based system can not address. A paper review provides no relationship to equivalency relative to standards but simply produces a conclusion based on a comparison of years of study.

ii. Describe the criteria that are applied to determine equivalency.

The National Dental Examining Board of Canada ("NDEB") is the body vested by an Act of Parliament as being

responsible for the establishment of qualifying conditions for a national standard of dental competence for general practitioners, for establishing and maintaining an examination facility to test for the national standard of dental competence and for issuing certificates to dentists who successfully meet this national standard. The NDEB through on-going in-depth investigation and analysis established the nationally accepted record of "Competencies for a Beginning Dental Practitioner in Canada".

The referenced "Competencies" are used to establish curriculums for full and degree completion programs, examination blueprints and accreditation standards for both Canada and the United States. We're proud to state that they have been used both nationally and internationally to establish processes not only in dentistry but in other professions as well. In short, they define the methods and mechanisms to be used to evaluate the competence of candidates. The four year dental programs, Equivalency Process, international degree completion programs and national examination assure that these competencies are being met by all practitioners whether Canadian or internationally trained. The RCDSO is of course a participatory member of the NDEB and has adopted these methods and mechanisms in partnership with the other Canadian (and American) DRA's. The NDEB conducts a psychometric analysis after each examination to ensure that its standards are current, accurate and reliable.

Provided that candidate's documents are not fraudulent and the institution is recognized by the government in the country of graduation, all applicants are eligible to participate in the new NDEB Equivalency Process. The Equivalency Process consists of three assessments over four days to determine whether the participant's knowledge, clinical skills, and clinical judgment are equivalent to those of a graduate of an accredited program.

Ultimately equivalency is determined by the methodologies described in section 8b including reciprocal agreements or successful completion of the NDEB Equivalency Process or the degree completion programs and the national examination.

### iii. Explain how work experience is taken into account.

The NDEB Equivalency Process is a form of Prior Learning Assessment in that it evaluates knowledge, clinical skills, and clinical judgment obtained both during a participants educational program and during any internship or practical experience. This is particularly true for graduates of programs in countries, and there are several, where students have little or no patient treatment experience in school. It must be stated as well that work experience cannot be heavily relied upon given the vast difference in the quality of training and of various levels of standards of practice throughout the world.

### d) If your organization relies on a third party to conduct competency assessments:

#### i. Describe the methodology used to evaluate competency.

Ultimately competency is determined through an accreditation process and reciprocal agreement or by successful completion of a bridging program or the NDEB Equivalency Process and then the national examination. The methodology used to evaluate competency is really the same criteria asked for in section 8b which questioned the methodology used to determine whether an international program satisfies the requirements for registration. A candidates training and their competency are intertwined and the information in 8b addresses both as follows:

The first method is to determine whether the program completed outside of Canada is approved in that jurisdiction by a valid and defensible accreditation process that has been determined to be equivalent to the CDAC accreditation process. As a result of having been deemed equivalent, a bilateral reciprocal recognition agreement between the CDAC and the organization responsible for accreditation of dental programs in the

jurisdiction will be made. One example of this is the reciprocal agreement that has existed for some time with the United States equivalent of the CDAC, the American Commission on Dental Accreditation (CODA).

As requested by the provincial DRA's and the National Dental Examining Board, over the past five years the CDAC has contacted numerous international dental regulatory authorities to inquire if an accreditation process similar to the CDAC process exists in their jurisdiction. In 2010, as a result of these contacts, a reciprocal agreement was implemented with the Australian Dental Council. Negotiations are currently underway to establish a reciprocal agreement with New Zealand. Preliminary discussions have been held with Hong Kong and the United Kingdom. Assistance with the development and implementation of an accreditation process is being provided to Korea.

The second method of assessing programs completed outside of Canada is a similar process to the one described above but originating out of the United States through CODA. CODA has established its own accreditation procedure for international dental programs that can be initiated at the request of the international dental program and with associated costs covered by the dental program. This process accredits international dental programs using the U.S. standards as the basis for the approval. With the Canadian/American reciprocal agreement in place, the NDEB (and therefore the RCDSO) will recognize graduates of international programs approved by CODA as graduates of approved programs.

Graduates of undergraduate dental programs approved under these reciprocal agreements are considered equivalent to graduates approved by the CDAC and are therefore eligible to take the NDEB certification examination.

The third method for determining whether a graduate of an undergraduate dental program is equivalent to a graduate of an approved program is for the candidate to complete a bridging program also known as a Qualifying/Degree Completion Program. There are over 70 Universities throughout Canada and the United States where this method can be accessed.

In 2010 the NDEB began processing applications for the fourth method used to determine whether a program completed outside of Canada, or more fittingly the candidate, satisfies the requirements for registration. Graduates of non-accredited dental programs are eligible to participate in the new "NDEB Equivalency Process". An individual who successfully completes this four day assessment will be considered equivalent to a graduate of an undergraduate dental program approved by the CDAC and therefore eligible to take the NDEB certification examination. Individuals who are not successful in the NDEB Equivalency Process are still eligible to apply for admission to a Qualifying/Degree Completion Program using the Equivalency Process results as the admission test with no other admission tests required.

## ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

Dental programs including the degree completion/bridging programs in Canada and the United States are grounded in a system of accreditation. The Commission on Dental Accreditation of Canada (CDAC), in partnership with the American Dental Association's Commission, reviews educational programs utilizing the aforementioned "Competencies for the Beginning Dental Practitioner in Canada" (see section 1.1).

The CDAC reports that they conduct structured, on-site visits following receipt of submissions presenting detailed information in the CDAC's required format. Programs and services meeting or exceeding the CDAC's requirements are granted accredited status. The starting point within accreditation is the CDAC's development, approval and ongoing revision of accreditation requirements.

Educational programs and dental services are invited to apply for review against current requirements. Programs applying submit detailed documentation outlining evidence addressing their compliance with accreditation requirements. A site visit is then arranged, and an accreditation survey team conducts interviews with faculty and students, to secure additional information.

The accreditation survey team is comprised of educators in the specific discipline, a representative of the regulatory authority and a representative of the certification organization (if applicable). The survey team includes representatives from both CDAC and ADA thus assuring that the same outcome measurements are being used and accreditation standards are met throughout Canada and the United States. This process clarifies issues arising from the submission and generally verifies that the documentation reflects the program or service. The survey team then submits a report to the CDAC for review at its annual meeting. The CDAC then determines the eligibility of the program or service for accreditation.

The NDEB regularly reports to the national federation and the RCDSO on its progress as an international expert and consultant in the field of examinations and competencies, on the results of its examinations and psychometric evaluations and publishes a Technical Manual (Attached) which provides detailed validity and reliability analysis for the NDEB examinations.

iii. Explain how work experience is used in the assessment of competency.

The NDEB Equivalency Process is essentially a Prior Learning Assessment that evaluates knowledge, clinical skills, and clinical judgment obtained both during a participants educational program and during any internship or practical experience. This is particularly true for graduates of programs in countries, and there are several, where students have little or no patient treatment experience in school. Conversely, work experience cannot be heavily relied upon given the vast difference in the quality of training and of various levels of standards of practice throughout the world.

e) If your organization relies on a third party to conduct prior learning assessments:

i. Describe the methodology used to evaluate prior learning.

As above, the NDEB Equivalency Process is essentially a prior learning assessment that evaluates knowledge, clinical skills, and clinical judgment obtained both during a participants educational program and during any internship or practical experience. This is particularly true for graduates of programs in countries, and there are several, where students have little or no patient treatment experience in school. Conversely, work experience cannot be heavily relied upon given the vast difference in the quality of training and of various levels of standards of practice throughout the world. It's used therefore to assist in determining eligibility for the Equivalency Process or admission to the bridging/degree completion programs.

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

As stated, work experience in itself is not a factor but may contribute to the candidate's overall knowledge base and therefore assist him/her during the assessment phase.

iii. Explain how work experience is used in the assessment of prior learning.

As stated, work experience in itself is not a factor but may contribute to the candidate's overall knowledge base and therefore assist him/her during the assessment phase.

f ) If your organization relies on a third party to administer examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

\*\*\* SAME AS LAST YEAR \*\*\*

Due to the fact that 99% percent of applicants are seeking a 'standard' general certificate of registration in order to engage in the broadest form of the practice of dentistry I will only review the examination for this form of licensure. The NDEB Written Examination consists of two papers, each with 150 multiple choice type questions. Each paper is given in a 150 minute examination session. The sessions are held in the morning and afternoon of one day.

The following subject areas will be tested in the examination: basic science knowledge as it relates to: human anatomy, physiology, histology, biochemistry, growth and development of the craniofacial complex, oral physiology, microbiology and immunology of oral diseases, neurological sciences, tooth morphology, pain, nutrition, pharmacology, biological effects of radiation, applied clinical science, knowledge and judgment including diagnosis, treatment planning, prognosis, treatment methods and clinical decision making in the areas of: general medicine and general pathology, oral medicine and oral pathology, radiology, Periodontics, preventive dentistry, operative dentistry, endodontics, prosthodontics, orthodontics, pediatric dentistry, geriatric dentistry, oral and maxillofacial surgery, therapeutics, dental biomaterials, behavioural sciences, dental public, health and epidemiology, ethics, pain and anxiety control, local anesthesia.

In order to assure the consistency of passing scores on all versions of the examination, the NDEB uses a test equating procedure. All candidates must obtain a minimum test equated score of 65 to be successful in the Written Examination. Candidates must be aware that the examination contains a number of questions that are being tested and that these questions may not contribute to any candidate's examination score. The Written Examination may be taken three times.

The OSCE is a station type examination comprised of a morning session and an afternoon session on the same day. The majority of the stations will have 2 questions and will require the candidate to review the information supplied (e.g. case history, photographs, radiographs, casts, models) and answer extended match type questions. Each extended match type question will have up to 15 answer options and one or more correct answer(s). All answers for these questions must be recorded on the answer score sheet provided.

A few stations may require the candidate to review the information supplied and write an acceptable prescription for a medication commonly prescribed by general dentists in Canada. Any required prescription must be legibly written on the supplied form and submitted as directed. The candidate's identification number must be correctly recorded on the prescription form. Candidates will have 5 minutes at each station to answer the questions. After 5 minutes the candidate will move to the next station.

The Question and Answer Framework for this examination is available on the NDEB website. The list of competencies from which examination items are developed is included in the Examination Regulations and References. Like the written format, in order to assure the consistency of passing scores on all versions of the examination, the NDEB uses a test equating procedure. All candidates must obtain a minimum test equated score of 65 to be successful in the OSCE. Candidates must also be aware that the examination may contain a number of questions that are being tested and that these questions may not contribute to any candidate's examination score. The OSCE Examination may be taken three times.

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

\*\*\* SAME AS LAST YEAR \*\*\*

The College utilizes two national examiners. As stated above the majority of applicants are seeking a general form of licensure and take the NDEB examination for general practitioners. There is also however a national examiner for dental specialists. In each case the examination is a "non-exemptible" requirement in our regulation and therefore an important part of our process. Accordingly, we clearly have for the purpose of public protection an obligation to ensure that the examination provides the necessary comfort level that successful candidates are competent to practice.

As referenced earlier, by an Act of Parliament the National Dental Examining Board of Canada "is responsible for the establishment of qualifying conditions for a national standard of dental competence for general practitioners, for establishing and maintaining an examination facility to test for the national standard of dental competence." The Royal College of Dentists of Canada ("RCDC") was vested by an Act of Parliament in 1965 to: (a) promote high standards of specialization in the dental profession; (b) set up qualifications for and provide for the recognition and designation of properly trained dental specialists; (c) encourage the establishment of training programs in the dental specialties in Canadian schools.

The NDEB and the RCDC are both named in Ontario's Registration Regulation and their role as examiners recognized. They are accepted by the national federation of dental regulators, the "CDRAF" as being our national examiners. The characteristics of a good test are universally stated to be: Validity, Reliability, Objectivity and Practicability.

The development and validation of examinations and competency systems is a science unto its own. Amongst many other methods, mathematical formulas are used in reviewing test results. "Cronbach's Alpha" measures how well a set of items (or variables) measures a single unidimensional latent construct. When data have a multidimensional structure, Cronbach's alpha will usually be low. Technically speaking, Cronbach's alpha is not a statistical test - it is a coefficient of reliability (or consistency).

Another mathematical tool is the "KR20" factor. In statistics, the Kuder-Richardson Formula 20 "is a measure of internal consistency reliability for measures with dichotomous choices (whereas Cronbach's is used for non-dichotomous measures)". We make no claim of being an authority in these matters and offer these references as evidence that examination development is complicated and requiring expertise. This is why we, and many regulators, use external examining bodies that specialize in this field.

As stated, the NDEB developed the manuscript of competencies for the beginning dental practitioner in Canada. These processes are never static and experts in the field clearly stipulate that, amongst other things, goal and standard setting, analyzing test results, performing psychometric validity testing, and periodic revalidation of competency statements are absolutely necessary as the profession evolves and the science progresses. Both national examining bodies perform these validation exercises on an ongoing basis in addition to periodic major reviews. They have proved the necessity for and reinforced the value of a national competency document and serve as a "reference for curriculum management, program accreditation, and development of certification examinations".

Every year certification and examination procedures and the responses of the candidates are assessed. Adjustments are made were indicated to improve the validity and reliability of the examinations. In addition to these internal reviews, the NDEB has invited several external evaluations. For a detailed accounting of the test construction process, validity, scoring and statistical analyses see "Technical Manual for The National Dental Examining Board of Canada, Written Examination and Objective Structured Clinical Examination".

iii. State how often exam questions are updated and the process for doing so.

\*\*\* SAME AS LAST YEAR \*\*\*

See above – 9. f) ii.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

As referenced throughout this report, in 2010 the NDEB, at the direction of the Canadian dental regulatory authorities, developed a new protocol for assessing internationally trained general dentists - the "NDEB Equivalency Process". This new protocol assists in determining the competencies of internationally trained general practitioners through a series of examinations and assessments. It does not replace the two year bridging programs but provides those who are competent and can meet Canadian standards with an opportunity to prove it and bypass the two year program. This path takes approximately nine months and only requires a few days in total of the candidate's time. This means less disruption to the candidate's life. Fees are determined and charged per stage so that applicants do not bear the burden of paying for the entire process up front which they might not successfully complete. The total cost for all stages of the assessment phase is approximately \$7,000 which is considerably less than the \$95,000 to \$156,000 for the bridging programs.

[BACK TO INDEX](#)

## Training (10 / 13)

a) Describe the training that your organization provides to:

i. individuals who assess qualifications

\*\*\* SAME AS LAST YEAR \*\*\*

We do not assess qualifications, we follow legislated requirements. See section 9 on third party providers.

ii. individuals who make registration decisions

The College has a vested interest and responsibility to ensure that only competent staff is hired and we use professional head hunters as the starting point. There are published job descriptions.

When hired, staff receives an orientation, training and copies of the applicable legislation/regulation/by-laws for them to memorize. Training includes shadowing an experienced staff person for several weeks, listening in on phone calls, reviewing email responses to questions from potential applicants and so forth. At an appropriate time (different for each individual), new staff will be given incoming correspondence to draft responses to that will then be reviewed by senior staff and/or the Supervisor. It typically takes about one year for a new staff person to be fully trained. If questions come in that are unfamiliar, staff approach the Supervisor or Manager at which time the answer is disseminated to all staff. Similarly, if there are changes to internal policies, process or legislation then meetings are called to ensure that all staff is familiar with and understand the changes.

The office is open concept and the Supervisor's desk is amongst the staffs so that daily phone calls, discussions and answers can be overheard and monitored. Staff signs contractual agreements when hired respecting their fiduciary responsibilities and privacy legislation.

The current supervisor of the department has 22 years experience with the College. The Manager has been

with the organization and the registration department for over 14 years and has as an additional 20 years of experience in administration, management and registration that include a local community college and the government of Ontario. Staffing levels are reviewed annually during the budget process. Registration staff is well directed and comfortable in approaching the Supervisor or Manager. There are annual performance reviews.

### iii. individuals who make internal review or appeal decisions

\*\*\* SAME AS LAST YEAR \*\*\*

The College is a not for profit organization mandated by the government of Ontario with regulating the practice of dentistry in the public interest. The first priority is to “protect the public’s right to safe, effective and ethical dental care”. Fairness, objectivity, consistency, impartiality, ethical decision-making and independence from biased parties or those with vested interests are the foundations of our procedures. This approach is also required under the Regulated Health Professions Act (RHPA) and the Dentistry Act. The legislation includes an independent appeals process to the Health Professions Appeal and Review Board (HPARB).

All members of our governing body, the Council, receive an orientation and volumes of material explaining their fiduciary role and the organization’s values. The documentation includes the working and legislative framework, our by-laws, protocols and processes, Code of Conduct and Conflict of Interest.

The Registration Committee, selected from Council and consisting of 3 dentists and one public member appointed by government, then has an additional orientation. Their binder of material includes:

- the RHPA
- Ministry of Health Appeal and Review Boards Act
- Mission and Vision Statement of the College
- Code of Conduct for Council/Committee members
- Conflict of interest policy for Council/Committee members.

The specific Registration section includes: the Committee’s authority under the RHPA, Composition and Powers of Panel, Conflict of Interest and Bias, Confidentiality, Review of Materials, the Registration Process from receiving an application, determining issues, investigation, obtaining expert opinions, conducting an interview, the decision and right of review and concludes with the roles of College staff.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

[BACK TO INDEX](#)

## Agreements on the Recognition of Qualifications (11 / 13)

Examples of agreements on the recognition of professional qualifications include mutual recognition, reciprocity and labour mobility agreements. Such agreements may be national or international, between regulatory bodies, associations or jurisdictions.

a) List any agreements on the recognition of qualifications that were in place during the reporting period.

As reviewed in 9.d, dental programs in Canada and the United States are grounded in a system of accreditation. To carry out this process and ensure that both countries recognize the professional qualifications/training of graduates of Canadian and U.S. programs, a reciprocal agreement exists between the Commission on Dental Accreditation of Canada and the American Dental Association. As requested by the provincial DRA's and the National Dental Examining Board, over the past five years the CDAC has contacted numerous international dental regulatory authorities to inquire if an accreditation process similar to the CDAC process exists in their jurisdiction. In 2010, as a result of these contacts, a reciprocal agreement was implemented with the Australian Dental Council. Investigations into other jurisdictions are in process at their request.

In 2009 there were two major agreements mandated by Government, 1) the Agreement on Internal Trade (AIT) and 2) the Ontario/Quebec Labour Mobility Agreement. Given the magnitude of the consequences that any disparity in registration requirements might have on public safety, this College and the national federation, the CDRAF, moved quickly to address the issue. The CDRAF meetings included not only the ten provincial Dental Regulatory Authorities but also CDAC, the national examiners, the Canadian Dental Association and the Association of Canadian Faculties of Dentistry.

There were many challenges but the concluding consensus was that the following principles must underpin the development of any national process:

- The mandate of all Provincial Regulatory Authorities is to regulate dentistry in the public interest by registering only competent and qualified individuals.
- A transparent, impartial, objective and fair assessment of an applicant's competencies and qualifications will be available, regardless of an applicant's origin.
- The goal of any process is to establish a process based on nationally agreed upon standards, processes and programs allowing for interprovincial portability of credentials and labour mobility.
- Only those applicants who are able to ultimately establish that they have the knowledge skills and competencies required of a general dentist in Canada, including but not limited to the successful completion of the NDEB, will be accepted for registration.

Based on these principles, the new NDEB Equivalency Process was developed to streamline the assessment of internationally trained general dentists. This second path to registration works side by side with the existing two-year bridging, Qualifying/Degree Completion programs. The NDEB started processing applications in 2010.

The national 2007 Memorandum of Understanding respecting the assessment of internationally trained dental specialists continued in 2010 and was inserted into the 2009 Mutual Recognition Agreement.

b) Explain the impact of these agreements on the registration process or on applicants for registration.

The agreement potentially increases mobility across the country and provides an opportunity to those who do not require the two year bridging program a means by which to prove it. They will consequently become registered faster and at far less expense. While the simplicity of this presentation belies the work and cost that went into it, the highlights of the new process are as follows:

- Access from anywhere in the world to a voluntary Web based self assessment tool;
- Upon submission of an application, a document verification is performed;
- An assessment of fundamental knowledge to verify basic training;
- Assessment of clinical skills consisting of two sections:
  1. Basic knowledge: a one-day theoretical exam, and
  2. Clinical judgment and skills: a three-day exam during which the candidate answers theoretical questions and takes an Objective Structured Clinical Examination (OSCE). On the next two days, the candidate's clinical

skills are evaluated using a mannequin. Candidates who fail this section are entitled to re-sit the exam.

- Just like their counterparts who graduate from accredited programs, successful candidates then challenge the national NDEB examination.

To be clear, the existing bridging/QP/Degree Completion programs throughout Canada and the United States have not been eliminated and have proved absolutely necessary in the majority of cases. This new protocol, however, has been adapted to not only determine who doesn't need the two-year programs (in Canada) but to also more efficiently evaluate who is eligible for the bridging/QP/Degree Completion programs. Compared to the two-year programs, which cost around \$95,000 to \$156,000, for those who qualify this new protocol is estimated to be around \$7,000.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

See 11b above.

[BACK TO INDEX](#)

## Data Collection (12 / 13)

### Languages in which application information materials are available

a) Indicate the languages in which application information materials were available in the reporting year.

Language	Yes/No
English	Yes
French	Yes
Other (please specify)	

### Paid staff employed by your organization

b) In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, 1 full-time employee and 1 part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
Total staff employed by the regulatory body	54
Staff involved in appeals process	1
Staff involved in registration process	5.5

### Countries where internationally educated applicants were initially trained

c) In the following table, enter the top source countries where your applicants<sup>1</sup> were originally trained in the profession (**excluding** Canada), along with the number of applicants from each of these source countries.

Enter the country names in descending order. (That is, enter the source country for the greatest number of your applicants in the top row, the source country for the second greatest number in the second row, etc.)

Use the dropdown menu provided in each row to select the country.

Note that only one country can be reported in each row. If two or more countries are tied, enter the information for these tied countries in separate rows.

Country of training (Canada excluded)	Number of applicants in the reporting year
U.S.	65
India	28
Iran	15
Iraq	9
Romania	6
Egypt	3
Belarus	2
China	2
Macedonia, The Former Yugoslav Republic Of	2
Russia	1

<sup>1</sup>Persons who have applied to start the process for entry to the profession. Select "n/a" from the drop-down list if you do not track this information. Enter "0" in a "Number of applicants" field if you track the information, but the correct value is zero.

### Jurisdiction where members were initially trained

d) Indicate where your members<sup>2</sup> were initially trained in the profession (use only whole numbers; do not enter commas or decimals).

The numbers to be reported in the **Members** row are the numbers on December 31<sup>st</sup> of the reporting year. For example, if you are reporting registration practices for the calendar year 2009, you should report the numbers of members in the different categories on December 31<sup>st</sup> of 2009.

	Jurisdiction where members were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
<b>Members on December 31<sup>st</sup> of the reporting year</b>	5040	1172	866	1462	0	<b>8540</b>

<sup>2</sup> Persons who are currently able to use the protected title or professional designation of the profession.

*Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.*

Additional comments:

### Applications your organization processed in the past year

e) State the number of applications your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
<b>from January 1<sup>st</sup> to December 31<sup>st</sup> of the reporting year</b>						
<b>New applications received</b>	105	65	45	89	0	<b>304</b>
<b>Applicants actively pursuing licensing</b>						

<b>(applicants who had some contact with your organization in the reporting year)</b>	n/a	n/a	n/a	n/a	n/a	<b>0</b>
<b>Inactive applicants (applicants who had no contact with your organization in the reporting year)</b>	n/a	n/a	n/a	n/a	n/a	<b>0</b>
<b>Applicants who met all requirements and were authorized to become members but did not become members</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who became FULLY registered members</b>	105	65	45	89	0	<b>304</b>
<b>Applicants who were authorized to receive an alternative class of licence<sup>3</sup> but were not issued a licence</b>	n/a	n/a	n/a	n/a	n/a	<b>0</b>
<b>Applicants who were issued an alternative class of licence<sup>3</sup></b>	n/a	n/a	n/a	n/a	n/a	<b>0</b>

<sup>3</sup> An alternative class of licence enables its holder to practise with limitations, but additional registration requirements must be met in order for the member to be fully licenced. Please list and describe below the alternative classes of licence that your organization grants, such as student, intern, associate, provisional or temporary.

*Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.*

Additional comments:

Essentially everyone who applies is interested in pursuing licensure. We do not track whether someone who becomes a member then chooses not to engage in practice or leaves Ontario. All members are required to meet continuing education requirements.

We are interpreting the statistical questions posed above to be within the context of applicants seeking to practice on the public. Some Colleges, for example, have "alternative or provisional" forms of licensure that permit candidates to practice while pursuing and fulfilling the requirements for full licensure. If this interpretation is correct then the College does not have an "alternative class of license". We do have different classes of certificates of registration created as stand alone forms of licensure with their own scope of practice and with specific conditions and restrictions all relating to the particular situation. For example, we do have a "student" class of certificate but it is not for undergraduate students or those

attending the bridging programs. These are educational programs created for individuals enrolled in graduate (specialty) programs. They do not directly relate to licensing requirements or private practice. Many of these students are from outside of Ontario and leave when the program finishes. Examples of restricted/non-private practice certificates of registration are listed in the table below.

	<b>Class of licence</b>	<b>Description</b>
<b>a)</b>	Academic	For full-time University faculty appointments. Restricted to their duties within the school.
<b>b)</b>	Graduate	Post dental degree students enrolled in specialty programs and restricted to those studies.
<b>c)</b>	Education	Hospital internship for students in residency based specialty programs such as oral and maxillofacial surgery. Restricted to the hospital and their training.
<b>d)</b>	Post-Specialty Training	As the name suggests, advanced training after completion of a specialty program - often called a "fellowship". Individual is restricted to the studies and training of their University/Hospital approved research.
<b>e)</b>		
<b>f)</b>		

<b>g)</b>		
<b>h)</b>		
<b>i)</b>		
<b>j)</b>		

**Reviews and appeals your organization processed in the past year**

f) State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

	<b>Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)</b>					
	<b>Ontario</b>	<b>Other Canadian Provinces</b>	<b>USA</b>	<b>Other International</b>	<b>Unknown</b>	<b>Total</b>
<b>from January 1<sup>st</sup> to December 31<sup>st</sup> of the reporting year</b>						
<b>Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee</b>	1	2	0	6	0	9
<b>Applicants who initiated an appeal of a registration decision</b>	0	0	0	0	0	0
<b>Appeals heard</b>	0	0	0	0	0	0
<b>Registration decisions changed following an appeal</b>	0	0	0	0	0	0

*Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the*

*correct value is zero.*

Additional comments:

Note that the above numbers do not explain context or the reason for referral to the Registration Committee. The majority of the referrals related to histories of disciplinary action, health matters or otherwise not meeting the requirements for a particular class of certificate. Only one case was referred on the basis of not meeting the training requirements and there exists a process to remedy that deficiency.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

[BACK TO INDEX](#)

### **Certification (13 / 13)**

I hereby certify that:

- i. I have reviewed the information submitted in this Fair Registration Practices Report (the "Report").
- ii. To the best of my knowledge:
  - all information required to be provided in the Report is included; and
  - the information contained in the Report is accurate.

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

Title: Registrar

Date: February 28, 2011

[BACK TO INDEX](#)