

College of CHIROPODISTS of Ontario

2023 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

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

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

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

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

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

The FRP:

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

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

2. Organization information

Organization name	College of CHIROPODISTS of Ontario
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For questions about this report, please contact:

Name	Meghan Clarke
Job Title	Deputy Registrar
E-mail	mclarke@cocoo.on.ca
Name	Nawaz Pirani
Job Title	Manager, Registration, Examinations and Quality Programs
E-mail	npirani@cocoo.on.ca

3. Registration requirements

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

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Chiropodist
Academic requirement	Currently, the following educational designations are the only ones recognized by the College: B Tech Pod – Baccalaureus Technologiae Podiatry B. Pod. – Bachelor of Podiatry B.Sc Pod – Bachelor of Science Podiatry D.Ch. – Diploma in Chiropody D.P.M. – Doctor of Podiatric Medicine D.Pod.M. –

	<p>Diploma in Podiatric Medicine An applicant must possess a diploma or degree from an approved program and is one of the educational designations listed. Applicants from non-approved programs must submit their academic information to the College for an evaluation that will be conducted by a third party. A report will be prepared for consideration by the College. The College will consider the academic evaluation report principally in connection with the criteria found in s. 4(1) 1 of the Registration Regulation which says: "The applicant must have successfully completed a post-secondary program approved by the Council whose curriculum includes courses in health sciences, chiropodial sciences, humanities and clinical education that, in the opinion of the Council, are relevant to the scope of practice of the profession." In addition, applicants must have engaged in clinical practice for a total of at least 3 months during the two years immediately preceding the date of application.</p>
<p>Experience requirement</p>	<p>Applicants must have engaged in clinical practice for a total of 3 months during the two years immediately preceding the date of application.</p>
<p>Language requirement</p>	<p>Applicants must be able to speak and write either English or French with reasonable fluency. The College defines "language proficiency" as the ability to communicate and</p>

	<p>comprehend effectively, both orally and in writing, in either English or French. You can demonstrate language proficiency through education, registration status (previous registration with the College or in another Canadian jurisdiction), language proficiency testing or experience. Applicants can meet the language proficiency requirement by achieving the minimum scores for one of the following tests: - CELPIP (General) - International English Language Testing System (IELTS): General and academic training versions - Test d'évaluation de français (TEF) - Test de connaissance du français pour le Canada (TCF) - Pearson Test of English (PTE) Applicants must achieve test scores for all test components during one complete attempt of the test. If necessary, applicants can re-take tests, in full, to demonstrate language proficiency.</p>
<p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p>	<p>Applicants with a D.P.M (Doctor of Podiatric Medicine) are unable to be registered in Ontario as Podiatrists due to a legislative restriction on registering podiatrists imposed by the Ministry of Health in July 1993. Any practitioner with a podiatric educational background will be registered as a chiropodist and must practice under the chiropody scope.</p>

4. Third party assessments

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

Organization name	Function
World Education Services	Academic credential evaluation
World Education Services	Prior learning and recognition
Martek	OSCE / Skill based exam
Martek	Knowledge based exam

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

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

The College has a Registration Examination Committee whose mandate is to create, maintain and administer the College's qualifying examinations. The Committee works with Martek Assessments Ltd, a full-service assessment consultation firm that provides services to many professional regulatory bodies in Canada. The members of the Committee provide subject-matter expertise in chiropody sciences while the consultant provides subject-matter expertise in item-writing, exam creation, blueprinting, etc.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Updated Accommodations Policy: The College updated its accommodations policy for those applicants sitting the College's Registration Examinations.
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	<p>The updated policy is written in plain language and ensures the College meets its legal obligations to accommodate while protecting the public with rigorous competency examinations. The College engages a third-party to review and assess accommodations requests and, where accommodations are denied, invites applicants to provide further documentation if they wish to pursue an accommodations request.</p>
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B. Risks and Mitigations

Risk	Mitigation Measure
<p>The legislative restriction on registration of DPMs as podiatrists significantly limits the provision of essential foot care services across many regions, particularly in remote and rural areas, as well as northern Ontario. This restriction poses a substantial risk to public health by preventing access to regular and preventative foot care services. The restriction has created a barrier to the profession because it has stymied the natural evolution of footcare in the province, limiting the number of chiropodists entering the profession, as well as the number of podiatrists. Compared to other jurisdictions, Ontario falls well short of the number of chiropodists or podiatrists needed to serve Ontario’s population. There are currently less than 850 registrants, whereas comparator data demonstrates a need for over 3000 registrants given Ontario’s population and aging demographic. In these underserved areas, the limited number of registered podiatrists means that</p>	<p>To effectively address the shortage of footcare specialists in Ontario and mitigate the risks posed by limited access to podiatric services, it is essential to advocate for the implementation of a full-scope podiatry model. This would involve several key components aimed at increasing the number of footcare specialists, as well as expanding scope of practice to ensure comprehensive footcare services are available to all Ontarians. Removal of legislative restriction on the registration of podiatrists (DPMs) is key, so more qualified footcare specialists can enter the workforce, particularly in underserved and remote regions of Ontario. Simplifying and accelerating the certification/licensure processes for podiatrists and chiropodists from other provinces and countries can help address immediate shortages - Recognizing equivalent qualifications and facilitating transition programs for international practitioners. Allowing chiropodists to practise to the full extent of their training and expertise is</p>

<p>many residents, especially vulnerable populations such as the elderly and those with chronic conditions like diabetes, may go without necessary foot care. This can lead to severe health complications that could have been easily prevented with regular monitoring and treatment by podiatrists. For example, without timely intervention, minor foot issues can escalate into serious infections, ulcers, and even amputations. This not only affects the quality of life of individuals but also places a greater burden on the healthcare system. The lack of accessible podiatric care in these regions underscores the need for a reassessment of the legislative cap, aiming to ensure that all citizens, regardless of their location, have access to the essential health services they require. Expanding the number of registered podiatrists would enable more comprehensive coverage, reduce the incidence of preventable foot-related health issues, and ultimately enhance the overall health and well-being of the population.</p>	<p>crucial and is in keeping with the full scope podiatry model in other jurisdictions in Canada. This includes granting them the authority to perform advanced procedures, prescribe a wider range of medications, and utilize diagnostic tools without unnecessary restrictions. Promoting the integration of podiatric services with primary healthcare can enhance collaborative care and ensure foot health is a regular part of patient assessments and treatments - early detection and prevention of foot-related issues. Increasing the number of training options and educational institutions offering podiatry programs can help build a larger pool of qualified specialists. Providing incentives, such as scholarships and grants for students willing to serve in rural and remote areas, can further encourage participation. Supporting ongoing professional development for registrants ensures they remain up-to-date with the latest advancements in footcare, enhancing quality of care.</p>
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6. Changes to registration practices

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

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	Yes	In 2023, the College amended the following registration policies, which were approved by Council in January 2024: Registration Examination Failures Registration Examination Accommodation Registration Examination Process, Procedures, and Appeals Returning to Practice
New or consolidated class of certificates or licenses	Yes	The Emergency Class was created in 2023. The class comes into effect when the Government of Ontario or College Council determines that it is in the public interest to register qualified chiropodists to address emergency circumstances.
Assessment of qualifications, including competency-based assessments and examinations	Yes	The Exam bank and OSCEs are reviewed and updated annually. In addition, it was decided in 2023 that written exams would return to in-person after going virtual in 2020 due to the pandemic.
Documentation requirements for registration	Yes	In 2023, the College mandated that applicants submit a recent criminal record check along with their application for registration. This requirement aligns with the current registration legislation requirements. The change took effect as of January 1, 2024.
Timelines for registration, decisions and/or responses	No	

Registration and/or assessment fees	Yes	Registration fees are reviewed annually and updated as needed. Registration exams are run on a cost-recovery model.
Changes to internal review or appeal process	No	
Access by applicants to their records	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	Staff training is provided on all matters related to registration, including applicants, registration exam, and renewal.
Resources or training to support applicants to move through the licensing process	No	
Anti-racism and inclusion-based policies and practices	Yes	An optional and anonymous EDI survey was introduced during the annual renewal process in 2023. Results of survey may impact future registration policies.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of	Yes	We are in regular contact with Martek Assessments and share any concerns on an

third-party service provider(s)		ongoing basis. Concerns are addressed in this manner.
Accreditation of educational programs	Yes	The Michener's Chiropody program is currently the only program in the province that trains chiropodists and it is not accredited. The College is of the view that at least an additional post-secondary institution with a podiatry program is required to meet the footcare needs of Ontarians. In particular, a program in the North where the highest rates of lower limb amputations arises is recommended.
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	Implementation of the Emergency Class Registration regulation, and the College's policy to provide an emergency class certificate of registration.
Technological or digital improvements	Yes	The registration database is being upgraded to the cloud version. The process began in 2023 and will be completed in Fall 2024.
Steps to address labour shortages in the profession or trade	Yes	Yes Engaging with the Ministry of Health, Council of Chiefs of Ontario, Ontario Society of Chiropodists, Ontario Podiatry Medical Association and other stakeholders, to advocate for the Full-Scope Podiatry Model to address shortages of footcare specialists in Ontario. The College has also met with Algoma University because of its mission to educate the northern Ontario communities as

		well as NOSM about the possibility of a joint podiatry program between Algoma and NOSM.
Other	No	

7. Membership and application data

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

A. Race-based data collected

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

Additional description:

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B. Other identity-based or demographic data collected

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

Additional description:

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C. Languages of service provision

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

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

D. Membership Profile

Profession Name	Total Number of Members
Chiroprapist	792

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	792	69

Gender	Number of Members
Male	331
Female	461

Jurisdiction of Initial Training	Number of Members
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Ontario	606
Other provinces and territories	109
United States	21
Other International	48
Other/not collected	8

Country of Initial Training	Number of Members
Australia	5
Canada	715
South Africa	4
Spain	1
United Kingdom	38
United States of America	21
Other Countries	8

Official language of preference	Number of Members
English	792

Racial identity (optional)	Number of Members
Not collected	792

E. Data Notes

The College implemented an optional anonymous EDI survey during the annual renewal process to collect racial identity, gender identity and other demographic data since 2023. This information is not linked to registrant profiles or annual renewal questionnaire. The College had 47 registered podiatrists in 2023. All of them were trained internationally, from the United States. There were 45 male and 2 female registrants in this registration class. They were registered as

podiatrists before the legislative amendment that restricted the registration of podiatrists came to effect as of July 1, 1993.

F. Applicant Profile

Profession Name	Total Number of Applicants
Chiropodist	32

Gender	Number of Applicants
Male	14
Female	18

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	28	0
United States	1	0
Other provinces and territories	1	0
Other International	2	0

Country of Initial Training	Number of Applicants
Canada	29
United Kingdom	2
United States of America	1

Official language of preference	Number of Members
English	32

Racial identity (optional)	Number of Members
Not collected	32

G. Data Notes

The numbers of new registrants has been steady but marginal when retiring registrants are taken into account. The rate of growth is insufficient to properly serve the footcare needs of Ontarians and, most importantly, prevent unnecessary and costly lower limb amputations. The College attributes the largely stagnated growth to the legislative restriction on registering DPM podiatrists which has served to stymy the entire footcare profession including attracting new students to study chiropody. This is further exacerbated by the fact of only one educational institution in the province, located in Toronto, with no other locations, to offer chiropody. In order to expand the numbers to meet the needs of Ontarians two things must happen: removal of the legislative restriction on registering DPM podiatrists and at least one more educational institution in Ontario offering a podiatry program. Ideally there should be at least one program located in the North in light of the triple rate of lower limb amputation.

H. Application Decisions

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

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
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Ontario	26	2	
United States		1	
Other provinces and territories		1	
Other International	2		

I. New Registrants

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

Class of registration	Total new registrants by class	Number of internationally educated registrants
Full / General/ Independent Practice	26	0

J. Data Notes

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K. Reviews and Appeals

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

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

Ontario	5	0
United States	0	0
Other provinces and territories	0	0
Other International	0	0

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

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0
United States	0	0
Other provinces and territories	0	0
Other International	0	0

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

Issue or reason raised	Number of appeals
1. Stress and unfamiliarity with OSCE set up	5

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

Reason for not registering	Number of internationally trained applicants
1. Failure of written exam or OSCE, or both	5

L. Data Notes

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8. Changes Related to New Legislative and Regulatory Requirements

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

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

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

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

A. Canadian Experience

Change required: No changes required

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

We did not require any changes as we were already in compliance.

B. Language Proficiency Testing

Change required: No changes required

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

As above

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

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

C. Emergency Registration

Change required: Yes

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

The Emergency Class comes into effect when the Government of Ontario or College Council determines that it is in the public interest to register qualified chiropodists to address emergency circumstances.[1] The Emergency Class exists for the sole purpose of allowing qualified registrants to provide care during an emergency. The application fee is set out in By-law No. 2: Fees. Registration Requirements Emergency Class applicants do not have to meet all the registration requirements for the General Class; however, they must: - Have completed a chiropody program approved by Council. - Successfully passed the jurisprudence examination set or approved by Council. - Report any past offences, or findings of guilt, professional misconduct, incompetence, or incapacity. - Report any current professional misconduct, incompetence, or incapacity proceedings. - Declare any health or conduct issues that could affect the applicant's ability to practice. - Speak and write either English or French with reasonably fluency. Terms, Conditions and Limitations Emergency Class registrants are subject to the following terms, conditions, and limitations: (O. Reg. 830/93, s. 10.1(1)) - The registrant must be supervised by a registrant in good standing who holds a General Class certificate of registration. - The registrant must always, when providing chiropody services, identify themselves as an Emergency Class registrant. Professional Liability Insurance The registrant shall maintain professional liability insurance in accordance with the requirements, set out in By-law No. 1: General, and shall provide satisfactory evidence to the Registrar (in the form and manner requested) that the registrant maintains professional liability insurance. Transitioning to the General Class of Registration Registrants in the Emergency Class may be eligible to practice as a chiropodist in Ontario by registering in the General Class. In some instances, certain registration requirements met to enter the Emergency Class can be carried over to a new application for the General Class. A registrant who holds an Emergency Class certificate, or who held an Emergency Class certificate within one (1) year of applying for a General Class certificate, and who practiced chiropody for at least 180 hours while holding an Emergency Class certificate of registration, is exempt

from the examination fee for the competency examination (O. Reg. 830/93, s. 4(4)) The successful completion of the competency examination is one of the registration requirements for the General Class. (O. Reg. 830/93, s. 4(1)(2)) [1] Note that individuals trained as podiatrists in jurisdictions approved by Council would be eligible to be registered in the Emergency Class. These individuals would be registered as chiropodists. See O. Reg. 830/93, s. 6.1(3). College Council also approved an Emergency Class policy on January 26, 2024 can be found here: <https://hmkc22.p3cdn1.secureserver.net/pdf/policies/Emergency-Class-Policy.pdf>

Glossary of terms

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

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

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

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

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

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

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

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

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