

Fair Registration Practices Report

Dental Surgeons (2008)

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

Misinformation or a lack of clarity only creates problems and delay for both applicants and the College. The College aims to be transparent and as clear as possible with applicants in the way it describes the registration application process. We have had information sheets for approximately 25 years, which are still continuously honed as processes evolve and we receive feedback from applicants. The sheets lay out the registration process and requirements for applicants in a step by step fashion. 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 available at the College for pick up or can be mailed. In addition, staff is well trained and proficient in providing verbal answers to phone or in person enquiries. While registration information can be gleaned from different sections under the "Registration/Licensing" index on the College website, including the aforementioned information sheets, there is also a dedicated section under the Registration index labeled "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 including on 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, the Regulation respecting dentistry is also on the College's website under its own heading.

b) requirements for registration

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, judgement 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 university before they will be permitted to challenge the NDEB

examinations. 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.

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

Section "b)" outlines all of the requirements for registration as lifted from the Regulation. More detailed informaton on how to meet the requirements including the necessary documentation is listed in "g)". I am, therefore, not completely clear on what this question is asking. The focus appears to be strictly on training though of course there are many other "requirements" for registration. If we focus on training then 1) we do not require "work experience" and 2) all international candidates must apply for advanced standing and successfully complete the final 3rd and 4th years of a Canadian or American based, accredited dental program. Upon completion they will receive a Canadian or American dental degree.

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

No

e) requirements that may be satisfied through acceptable alternatives

If the question's focus is on training then currently candidates must complete the aforementioned final two years of accredited dental programs. We are at the beginning stages, however, of creating a second stream or path for assessing the competencies of internationally trained general practitioners. To be clear, this process will not replace the two year programs. It's a separate path that offers an opportunity for those who can prove competency to do so through a series of examinations and assessments ending in our national examination. This path will take approximately one year but only requires a few weeks in total of the candidates time. This means that candidates will be free to seek employment and their lives will be less disrupted. The cost is considerably less as well. We hope to have this process available in the later half of 2010.

f) the steps in the assessment process

See above

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

A certified (by a lawyer or notary public) copy of the diploma must be provided plus an original letter from the Dean of the university certifying graduation and the date. International applicants who in addition to a four year dental program have completed an Advance Standing, Degree Completion or Qualifying program at the undergraduate level, must submit a certified copy of their original dental degree in addition to a certified copy of the advanced standing/degree completion program degree and an original letter from the Dean of the Canadian or U.S. university certifying graduation and the date. Information respecting both programs must be recorded under the "Dental Education" section of the application form. Any applicant who also completed a mandatory internship, house job or residency program at the end of their dental program or in conjunction with

their dental program, must submit a certified copy of the completion certificate, letter from the school or work book. The College's "Certificate of Standing" form completed by the Regulatory Authority in each jurisdiction where an applicant has practised or been granted the right to practice. If still practising in the respective jurisdiction at the time of the application then the form must be current and is therefore only valid for three (3) months. Reference letters or photocopies of a licence will not be accepted in place of the certificate of standing form. A certified copy of the certificate from the NDEB. If a Canadian citizen or permanent resident, a certified copy of a Canadian passport, birth certificate, citizenship card (both sides) or proof of permanent residency status must be submitted. If not a citizen or permanent resident, a certified copy of the authorization issued by Immigration Canada which permits the person to engage in the practice of dentistry in Canada (i.e. work permit) must be submitted. If applying under a name which is different from the one recorded on the dental diploma, a certified copy of the name change, marriage certificate, or divorce decree (as applicable) must be forwarded with the application.

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 99.9% of the cases the applicant is capable of obtaining the required documentation. The acceptable alternatives are not listed because 1) its dependant on where the applicant is coming from and 2) regrettably daily experience shows that applicants will take the easiest path available to them. For example, applicants who are quite capable of obtaining letters of standing would 'choose' to do a Declaration rather than take the time to obtain proper documentation. To accept this approach would be in contravention of our mandate to perform due diligence. In rare and extreme cases, e.g. a refugee who has no documentation, we will accept a statutory declaration. Even in these extreme cases often the applicant has other relevant/supporting documentation when you make the right inquiries.

i) how applicants can contact your organization

Phone, mail, email, in person.

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

By any means necessary though this is often dictated by the applicant themselves on their application form. We will typically choose the fastest method, namely phone or email whenever possible. As to why, that varies with each application but typically it involves notifying candidates about improper or missing documentation.

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

Candidates must provide both certified copies of the original documents and translations performed by a registered translator or other suitable, recognized authorities such as staff in a Consulate or Embassy.

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

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 is comprised of twelve members. Each Dental Regulatory Authority ("DRA") appoints one member and two members are appointed by the Commission on Dental Accreditation of Canada ("CDAC"). The NDEB through in-depth investigation and analysis has established the nationally accepted record of "Competencies for a Beginning Dental Practitioner in Canada". This list is transparent and available on their website. These 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 RCDSO is also an active and vocal member of the Canadian Dental Regulatory Authorities Federation ("CDRAF"). The CDRAF became a legally constituted organization on March 3, 2004. 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. 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. They are accepted by the CDRAF as being our national examiners. As reviewed above, 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 have their own admissions processes and are outside of our control. These processes were reviewed during our recent audit for the OFC and deemed to be fair and reasonable. A human rights expert has made the same determination.

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 have been 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. This was deemed a reasonable time period given the fact that, as stated candidates have already had months or years to obtain the necessary documentation and requirements. 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 the stated jurisdiction. If the applicant has an older letter of standing but is no longer in the originating jurisdiction then we will accept letters of standing older than three months.

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

Once an application is complete, which we have no control over, two weeks.

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

January 1 to May 31 \$1,760.00 June 1 to August 31 \$880.00 September 1 to December 31 \$530.00 Plus Application fee of \$100.00 and the Registration fee of \$100.00 added to each of the above membership fees. The membership fee includes malpractice insurance. Jurisprudence and Ethics Course, a registration requirement - \$225.00 Qualifying/International Dentist Program Costs: Tuition and associated expenses for two years from \$90,000.00 to \$140,000.00 (depending on the University) total. National Dental Examining Board of Canada (General Practitioners) FEES for November 1, 2008 - June 30, 2009 REGISTRATION FEE \$350.00 EXAMINATION FEES Written Examination - \$600.00 Objective Structured Clinical Examination (OSCE)- \$900.00 RE-SCORING FEE A candidate who is unsuccessful in an examination may, within 3 months of the release of their results, make a written request for a manual rescoring of their examination. A rescoring fee of \$150.00 per examination must accompany each request. RE-SIT FEES The same as the fees for initial challenge. The Registration fee is not charged again. Royal College of Dentists of Canada (for Specialists)

Application Processing Fee - \$500 NDSE Examination Fee - \$5,500 Standard fee for all new applicants. This includes all required components. Breakdown of components as follows: \$1,000 Component I (Written) Only (1) \$4,500 Component II (Clinical) Only Formal Examination Appeal - \$500 Re-sit Application Fee - \$250 Examination fees - same as with initial challenge

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

We have never had a candidate with special needs. Broadly speaking, a physically impaired person including those, for example, who are paralyzed in the upper limbs or visually impaired, would never be accepted into dental school in the first place. If presented with such a scenario then the application would be referred to the Registration Committee and/or a special panel of experts would be convened to look at what the applicant wishes to do and to make a determination as to whether an accomodation is possible.

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

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Amount of Fees (2 / 13)

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

No.

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

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

a) What are your timelines for making registration decisions?

As previously stated, two weeks or less.

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

Two weeks or less respecting a review of the application. Immediately when candidate is actually registered.

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

There are no "Reasons" respecting normal applications. Reasons are only provided if a candidate has been

through the Registration Committee and been 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.

The question of staffing needs are reviewed annually during the setting of the College budget. The Supervisor and Manager monitors all functions of the department. If the situation arose where we were unable to meet our timelines on an ongoing basis then the situation would be raised with the Directors and Registrar. Please also note that the two week timeline for normal applications would be the timeline at our busiest times of year. More typical would be a week. Where an applicant has been denied registration, considering that the process involves at least six people, all professionals who have other obligations, it is impossible to guarantee a timeline. 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.

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Access to Records (4 / 13)

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

The applicant provides most of the documentation and therefore would already have copies or originals of his/her records. If an application is referred to the Registration Committee and documentation not in the possession of the applicant is received then the RHPA clearly and simply spells out the policy of access to records. In short, applicants are entitled to receive copies of everything that the Registration Committee receives when formulating a decision. This is done automatically and without any fees being charged.

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

N/A

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

N/A

d) List the fees for making records available.

N/A

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

N/A - no fees are charged.

Please identify and explain the changes in your registration practices relevant to this section that

occurred during the reporting year.

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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.

All our requirements and an Immigration approved "Career Map" are available on the RCDSO website. Information about the degree completion programs and the national examiners including exam blueprints, suggested reading etc. are available on those websites.

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

Our information sheets and career map refer candidates to the above stated websites.

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

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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.

The Registration Committee meets approximately every two months and the "timeline" therefore depends on when an application requiring an appeal of the Registrar's decision is submitted. On occasion and depending on the Agenda the Committee might not meet for 3 months. This situation is carefully monitored, however, and if the 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. The RHPA also requires us to give applicants 30 days notice of a referral to the Committee and to make a 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. Once the Committee has met the decision goes out in less than a week.

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

N/A

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

N/A

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

Once a referral to the Committee has been made, as stated in "a)" we must give the applicant 30 days to make 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.

Formal written Notice of the referral must be given by us. This means mailing the notice but we will usually also 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. As for the "form" that the applicant's submission must take, there are no rules in this respect. The applicant can walk it in, mail it, email it. There is no formal document that he/she must complete. 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.

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. The Registrar does not attend Committee meetings involving applications. The only time he would attend would be at the Committee's invitation and only in cases where policy or regulation matters were being discussed and his input was thought prudent.

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 but even if it didn't it's 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. 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. 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.

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

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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.

Again, the RHPA dictates 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 that package also includes "Notice" of the appeals procedure, who to contact, amount of legislated time allowed and so forth. As previously referenced, the RHPA also stipulates that applicants must be given every document that the Registration Committee had and on which it based its decision.

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

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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. 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.

The only certainty is that dental programs around the world vary dramatically in scope and quality. We are basically dealing with a huge unknown when it comes to not only the training in different countries but the training in different Universities even within the same country. Furthermore, 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. We know that international candidates have consistently proven to be far below Canadian and American trained candidates as evidenced by their performance on admission's tests and during the bridging programs. Foreign jurisdictions have also been uninclined to accept criticism or investigation of their programs. In addition, accrediting programs is an expensive process that neither these international jurisdictions or our government is prepared to financially support. Some movement is taking place, however, in that the dental regulator in Quebec has received government direction and financial support to investigate dental programs in France including a formal review of the various University dental programs. Australia has also invited our national examiner to assist it in improving its programs and examinations. Future recognition/alliances with these countries might therefore be possible.

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

See section 9

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.

See section 9

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

See section 9. 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.

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

N/A

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

As previously stated, I have not experienced a single example of a special need from a physical perspective. Dentistry requires the use of all upper limbs and sight. We and the other institutions listed are wheel chair accessible where that might be the disability. Accommodations are made in the case of a religious special need.

Examinations scheduled on Saturdays, for example, are 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.

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 two years for the candidate to complete the degree completion/bridging program.

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

Again, if this includes meeting the pre-College requirements then internationally trained individuals must complete the two year degree completion/bridging program.

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.

Already explained in numerous places.

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.

N/A

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

N/A

iii. Explain how work experience is taken into account.

N/A

j) If your organization conducts competency assessment:

i. Describe the methodology used to evaluate competency.

Competency is determined by successful completion of the degree completion/bridging program and national examination. See section 9

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

N/A

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

N/A

k) If your organization conducts prior learning assessment:

i. Describe the methodology used to evaluate prior learning.

N/A

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

N/A

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

N/A

l) If your organization administers examinations:

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

N/A

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

N/A

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

N/A

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

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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.

Dalhousie University Laval University McGill University University of Alberta University of British Columbia University of Manitoba University of Montreal University of Saskatchewan University of Toronto University of Western Ontario All Universities in the United States that have dental programs Association of Canadian Faculties of Dentistry National Dental Examining Board of Canada Royal College of Dentists of Canada World Education Services Standard recognized language testers such as TOEFL OVERVIEW: As to how we ensure our third party organizations are working appropriately, we have regular and ongoing contact with the two Ontario Universities. They inturn through the ACFD meet with the other Universities in Canada. It must be noted, however, that Universities throughtout the world prize one thing above all others and that is their independence. The Ontario schools have been supportive and cooperative within the limitations of budget, facility, staffing etc. Our Council also has a representative from each Ontario school. We cannot, however, control these institutions or the numerous Universities throughout the United States which all feed into our system of accredited training including that for the internationally trained. One thing is clear and that is that all these institutions have come to the same conclusions respecting the need for bridging programs for these candidates. The NDEB and RCDC are not for profit organizations, their fees, therefore, must be considered "fair" as they are based on cost recovery only. The examiners for the RCDC are actually all volunteers. This is commendable and speaks to the dedication of the profession. At the same time, it's recognized that a stronger

governance model would be prudent and the College has made recommendations to the RCDC in this regard as well as suggesting public representation on their Council similar to the government mandated policy of public members on our College's Council. From a governance perspective or how we ensure our third party organizations are working appropriately, every Canadian DRA has representation on the Board of the NDEB and therefore there is direct monitoring and guidance and an additional contractual agreement is therefore unnecessary. The Commission on Dental Accreditation also sits on the Board. The College receives an annual report from the NDEB. As part of recent negotiations with the RCDC we have asked them to give us an annual report as well. The RCDC has two representatives on its Council from the Commission and two from the dental regulatory authorities. We are currently in the final stages of negotiating a stand alone contract between us and the RCDC but one must bear in mind that the RCDC is answerable to the country and not just this province. Our contractual discussions have included suggestions on improving the RCDC's appeal's process. The RCDC's fee structure for appeals was deemed unacceptable and the message firmly delivered. The RCDC is acting cooperatively and it must be recognized that, like the RCDSO, it has its own levels of bureaucracy and approval mechanisms that must be honoured. From the perspective of transparency, both examination bodies have websites and information packages that describe the examination formats, suggested topics for study, dates, fees, history, by-laws, government appointed authority, appeals process and more. All these bodies are answerable to the DRA's at the national level and report regularly at meetings of the CDRAF which is another level of accountability.

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

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, examinations, appeals.

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

As already explained this information is either not available and/or inaccurate, anecdotal or biased. Where it is known it supports the contention that, at least for those countries that currently provide the applicant pool, training is insufficient. Information respecting admissions, examination and performance in bridging programs supports this conclusion as well. For those few who can demonstrate that they don't require the two year bridging program we are developing a second stream process. 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 process will be. Meanwhile, actual mobility numbers in the EU are far below what was expected because jurisdictions continue to have problems recognizing "foreign" workers credentials.

iii. provides timely decisions, responses and reasons to applicants

See a).

iv. provides training to individuals assessing qualifications

We are dealing with professional organizations and not doing this work ourselves because they are the experts in these fields. "Training" therefore seems like an inappropriate description. These bodies utilize the talents of "trained" educated researchers, professors, credential assessors, statisticians, psychometricians and specialists in document research and fraud.

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

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 realibility 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.

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

As previously stated, I have not experienced a single example of a special need from a physical perspective. Dentistry requires the use of all upper limbs and sight. We and the other institutions listed are wheel chair accessible where that might be the disability. Accomodations are made in the case of a religious special need. Examinations scheduled on Saturdays, for example, are 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.

That is for the credential assessors at the Universities and/or WES where utilized, to answer.

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

That is for the credential assessors at the Universities and/or WES where utilized, to answer. Ultimately equivalency is determined by successful completion of the degree completion programs and the national examination.

iii. Explain how work experience is taken into account.

That is for the credential assessors at the Universities to answer. Work experience or PLA is only used to assist in determining eligibility for the bridging programs.

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

i. Describe the methodology used to evaluate competency.

That is for the Universities to determine. Ultimately competency is determined by successful completion of the degree completion programs and the national examination.

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

Competency is determined by successful completion of the degree completion programs and the national examination. 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, in partnership with the American Dental Association's Commission, reviews educational programs utilizing the aforementioned "Competencies for the Beginning Dental Practitioner in Canada". 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.

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

N/A Competency is determined by successful completion of the degree completion programs and the national examination.

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

i. Describe the methodology used to evaluate prior learning.

That is for the credential assessors at the Universities to answer. PLA is used only to assist in determining eligibility for admission to the degree completion programs.

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

That is for the credential assessors at the Universities to answer. PLA is used only to assist in determining eligibility for admission to the degree completion programs.

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

That is for the credential assessors at the Universities to answer. PLA is used only to assist in determining eligibility for admission to the degree completion programs.

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

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

The 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 human physiology human histology human 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 this website. The list of competencies from which examination items are developed is included in the Examination Regulations and References. Passing Score

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.

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 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 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.

See above - ii.

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

Training (10 / 13)

a) Describe the training that your organization provides to:

i. individuals who assess qualifications

N/A We do not assess qualifications, we follow legislated requirements.

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. Staff of course receives orientation, training and the applicable legislation/regulation/by-laws when they are hired. They sign contractual agreements respecting their fiduciary responsibilities and privacy legislation. The current supervisor of the department has 21 years experience with the College. The Manager has been with the organization and the registration department for over 12 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 whenever questions arise. There are annual performance reviews.

iii. individuals who make internal review or appeal decisions

The College is a not for profit organization mandated by the Government of Ontario with regulating the practice of dentists in the public interest. The first priority is to “protect the public’s right to safe, effective and ethical dental care”. Fairness, consistency, impartiality, ethical decision-making and independence respecting how policies/regulations are set and how applications are processed are the foundations of our procedures. They are also required under the RHPA and the Dentistry Act. This legislation includes an independent appeals process to HPARB. All members of Council receive an orientation and material explaining their role and the organization’s values, working and legislative framework, by-laws, protocols and processes, Code of Conduct and Conflict of Interest. The Registration Committee (consisting of members selected from Council) then has an additional orientation. These binders of material includes: • 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 • Registration includes sections on: Authority under the RHPA Composition and Powers of Panel Conflict of Interest and Bias Confidentiality Review of Materials The Registration Process from application, determining issues, investigation, obtaining expert opinions, conducting an interview and the decision, right of review and roles of College staff.

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

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.

See 9d)ii respecting the North American agreed upon system of recognition on dental training. As outlined previously, the NDEB is the body responsible for establishing qualifying conditions, standards of competence and examinations at the national level. It needs to be stated that CDAC and NDEB processes, and those necessarily of the Regulatory Bodies that use them, have evolved over the decades and continue to transform and improve as the needs of the profession, the public and scientific knowledge changes. Dentistry has a labour mobility agreement which amongst other things confirms the information above, namely that all applicants must have completed an accredited program (which includes the 4 year dental programs and the 2 year degree completion programs for international students) and the national examination. At this writing all Regulators are in the throws of attempting to implement the federal and provincial Agreement on Internal Trade.

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

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

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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	No
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	50
Staff involved in appeals process	1
Staff involved in registration process	5

Countries where internationally educated applicants were initially trained

c) In the following table, enter the top source countries where your applicants* 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
	N/A
India	N/A
Iran	N/A
Pakistan	N/A
Egypt	N/A

*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* 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 31st 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 31st 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
Members on December 31st of the reporting year	4969	1094	796	1309	N/A	8168

* 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:

Note for 12b) - Only 1 staff person, the Manager, is involved in the appeals process, however, that staff person is not a decision maker. Decisions are made by 4 Registration Committee members along with the guidance (if requested) of legal counsel. None of these individuals are legally defined as being "staff".

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).

from January 1 st to December 31 st of the reporting year	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

New applications received	N/A	N/A	N/A	N/A	N/A	0
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	N/A	N/A	N/A	N/A	N/A	0
Inactive applicants (applicants who had no contact with your organization in the reporting year)	N/A	N/A	N/A	N/A	N/A	0
Applicants who met all requirements and were authorized to become members but did not become members	N/A	N/A	N/A	N/A	N/A	0
Applicants who became members	108	49	51	76	N/A	284
Applicants who were authorized to receive an alternative class of licence* but were not issued a licence	N/A	N/A	N/A	N/A	N/A	0
Applicants who were issued an alternative class of licence*	N/A	N/A	N/A	N/A	N/A	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:

We do not track this information. Essentially everyone who applies is interested in pursuing licensure and 99.99% of applications are approved. There might be one or two a year who are denied registration. The answer therefore becomes a duplicate of 12d) The College does not have an "alternative class of license". We took this to mean a "provisional license" which many Colleges issue to people who are completing registration requirements such as a mentoring/bridging program or a practice hours requirement. The College does have different classes of certificate of registration but these are stand alone forms with their own scope and definition created to fulfill a particular need. For example, we do have an Intern's license but the training being completed has nothing to do with qualifying for another form or general licensure. We do not register/license individuals going through our degree completion/bridging programs. They fall directly under the jurisdiction and monitoring of the Universities.

	Class of licence	Description
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a)		
b)		
c)		
d)		
e)		
f)		
g)		
h)		
i)		
j)		

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).

from January 1 st to December 31 st of the reporting year	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
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	20	5	4	6	N/A	35
Applicants who initiated an appeal of a registration decision	0	0	0	0	N/A	0
Appeals heard	0	0	0	0	N/A	0
Registration decisions changed following an appeal	0	0	0	0	N/A	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 numbers do not indicate context. Only one of these referrals to the Registration Committee was on the basis of an international applicant refusing to meet a non-exemptible registration requirement. All others were due to disciplinary histories, health matters or in connection to the implementation of the new specialty in Anaesthesia.

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

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Certification (13 / 13)

I hereby certify that:

- I have reviewed the information submitted in this Fair Registration Practices Report (the "Report").
- All information required to be provided in the Report is included.
- 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 27, 2009

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