



Royal College of Dental Surgeons of Ontario

Audit of Registration Practices

For the period July 16, 2007 to July 15, 2008

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Executive summary

Deloitte was engaged by the Royal College of Dental Surgeons (the "College") to perform a compliance audit in accordance with section 5815 of the CICA handbook, with respect to the College's compliance with sections 15-22, 22.2-22.4, 22.6-22.7, and 22.9-22.11 in schedule 2 of the Regulated Health Professions Act ("RHPA") for the period from July 16, 2007 to July 15, 2008.

The audit involved four distinct phases, as follows:

1. Document the specific legislative requirements to be audited;
2. Through discussion with College staff identify the processes and procedures employed by the College to meet the legislative requirements;
3. Assess the adequacy of the Colleges policies and procedures in consideration of the evaluation criteria established by the office of the Fairness Commissioner as outlined in the Framework for Audits of Registration Practices & RHPA.
4. Design and perform tests to determine if the College is in compliance with the processes and procedures identified in step two.

In Appendix 1 of this report we have included a table summarizing each legislative requirement, the College's policies and procedures addressing the requirement, the evaluation criteria being addressed, the audit procedure to test the policies and procedures and our observations and conclusions with respect to each step.

The College processes the following types of applications:

- General Certificates
- Specialty Certificates
- Combined General/Specialty Certificates
- Academic Certificates
- Education Certificates
- Graduate Certificates
- Post-Specialty Training Certificates
- Academic Visitor
- Instructional
- Short duration
- Reinstatement

The table below provides statistical information related to the period from July 16, 2007 to July 15, 2008 (the period under examination). Of 333 applications processed during the year, 267 (80%) were applications for General Certificates and 22 (7%) were applications for specialty certificates. Given that these two types of Certificates accounted for 87% of total applications and given that these are the only types of certificates which allow the bearer to engage in private practice, we have limited our procedures to these types of certificates.

Key statistics for the period of July 16, 2007 to July 15, 2008

Type of Certificate	Applications Processed	Applications Approved for Registration	Applications currently open, pending registration committee approval	Applications Refused for Registration
General Certificates	267	267	0	0
Speciality Certificates	22	19	2	1
Academic Certificates	2	2	0	0
Graduate Certificates	12	12	0	0
Education Certificates	17	17	0	0
Post-Speciality Training Certificates	13	13	0	0
Total	333	330	2	1

Of the total of 333 applications processed during this period, only one applicant was refused registration of a speciality certificate. The applicant was refused as a result of not being able to successfully complete the National Dental Speciality Examination administered by the Royal College of Dentists of Canada (RCDC) which is a non-exemptible requirement of the Dentistry Act, 1991.

Breakdown of International and Domestic Applicants on General and Specialty Certificates

Type of Certificate	Applications Processed	Applications Approved for Registration	Applications currently open, pending registration committee approval	Applications Refused for Registration
General- Domestic (includes US)	206	206	0	0
General- Internationally trained	61	61	0	0
Speciality- Domestic (includes US)	20	19	1	0
Speciality- Internationally trained	2	0	1	1

Breakdown of Applications Referred to the Registration Committee

	Domestic (Includes US)	Internationally Trained
General	4	2
Specialty	0	2

Breakdown of Approved Applications with Terms and Limitations Imposed on Registration Certificate

	Domestic (Includes US)	Internationally Trained
General	3	1
Specialty	0	0

Conclusions

We have concluded that the College has policies and procedures in place which adequately address the specific requirements of the RHPA noted above and that these policies and procedures were in place throughout the period under examination. We therefore have concluded that the College is in compliance with sections 15-22, 22.2-22.4, 22.6-22.7, and 22.9-22.11 in schedule 2 of the Regulated Health Professions Act ("RHPA") for the period from July 16, 2007 to July 15, 2008. We have provided our formal opinion in Appendix 2 of this report.

We have also concluded that overall, the registration policies and procedures of the College appear to be fair, transparent and reasonable. In arriving at our conclusion we considered the following evaluation criteria identified by the Office of the Fairness Commissioner:

- Information to applicants;
- Timely decisions and responses;
- Internal review or appeal;
- Information on appeal rights;
- Documentation of qualifications;
- Assessment of qualifications;
- Training; and
- Access to records.

We have noted where we believe these criteria are effectively addressed by policies and procedures of the College in Appendix 1. In Appendix 3 of this report, we include general observations in respect of these evaluation criteria.

Appendix 1

Audit program

Appendix 1 – Audit program

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
1		<i>15(1): When a person applies to the Registrar for registration does the Registrar (a) register the applicant or (b) refer the application to the Registration Committee?</i>	A file is created in the system for the applicant when an application form is received by the Registrar. Each applicant will be assigned a number which is generated automatically by the system and will ultimately become their registration number. A requirements checklist will also be generated in the file to keep track of all documents received or outstanding as an application is not complete unless all required pieces of information are included. Once the application is complete, a minimum of two registration staff review applications against the list of legislated & College requirements. If requirements have been met and no issues are noted, the supervisor or manager then does final approval and sign-off. At this point, an applicant will be notified that they have been registered through a phone call or e-mail, and then through a formal notice.	<p>Select 190 applications from the complete listing of applications that were received by the Registrar for the period under audit. Ensure that a file was opened for each applicant and a checklist was generated.</p> <p>A complete listing of General and Speciality applications processed from July 16, 2007 to July 15, 2008 was generated from the College system by running 3 separate queries</p> <ol style="list-style-type: none"> 1) All applications that were approved by Registration during the period (this includes applications referred to the Registration Committee) 2) All applications that were refused registration certificates 3) All applications still open for this period 	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
			<p>For applications that will be referred to the Registration Committee, applicants will be officially notified through a formal notice or other informal means such as an e-mail or phone call that their applications have been referred to the Committee.</p>	<p>Review the file for evidence that the applicant was either registered or referred to Registration Committee by 1) Reviewing formal sign-off by supervisor or manager that application is complete; 2) Checklist to ensure all documentation was received; and 3) A copy of notice sent to applicant confirming registration.</p> <p>For applications referred to Registration Committee, review copy of formal notice or other evidence that applicants were notified.</p>	
2		<p><i>15(2): Did the Registrar refer an application for registration to the Registration Committee because they (a) have doubts, on reasonable grounds, about whether the applicant fulfils the registration requirements, (b) believe that terms,</i></p>	<p>Applications are referred by the Registrar as a result of the following: a) does not meet requirements for registration as recorded in the Regulation, b)disciplinary action or breaches of the standard of practice in another jurisdiction, c) physical medical issue, mental health issue, addiction issue, d) illegal practice, e) conviction of a criminal offence; sexual abuse/harassment, f) reinstatement</p>	<p>Select all applications referred to the Registration Committee for the period under audit. Ensure that that the application was referred as a result of one of the following criteria (a) to (f) being incurred by reviewing documentation in the applicant file such as copy of the referral notice sent to applicant.</p>	<p>College is in compliance with identified procedures.</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>conditions or limitations should be imposed on a certificate of registration of the applicant and the applicant does not consent to the imposition or (c) propose to refuse the application?</i>	application made over two years of the date of the resignation or suspension, g) Registrar would like to impose, terms, conditions or limitations on certificate of registration. h) Registrar proposes to refuse		
3	<i>Internal Review or Appeal & Timely Decisions, Responses and Reasons</i>	<i>15(3): If the Registrar refers an application to the Registration Committee, did he or she give the applicant notice of the statutory grounds for the referral and of the applicant's right to make submissions under 18-subsection 1?</i>	A formal notice or informal method such as an e-mail or phone-call, stating statutory grounds for referral and applicant's right to make written submission to the Registration Committee within 30 days after receiving the letter will be sent or communicated to applicants.	Select all applications referred to the Registration Committee for the period under audit. Review copies of the notices or other documentation to ensure that the statutory grounds for referral, and applicant's right to make a written submission to the committee were disclosed.	Out of the 8 applications referred to the Registration Committee it was noted that the College is in compliance with identified procedures.
4		<i>15(4): Did the Registrar receive approval from a panel of the Registration Committee selected by the chair in cases where the Registrar has an opinion that a certificate of registration should be issued to an applicant with terms,</i>	The Registrar is required to refer an application if there are doubts that applicant meets requirements, considers imposing Terms, Conditions and Limitations or intends to refuse the application. However, in select cases, the Registration Committee has given that Registrar authority to impose terms, conditions or limitations. These types of cases occur	For applications selected in Step 1 where Registrar was of the opinion that certificate of registration should be issued with certain terms, conditions or limitations imposed, review the minutes of the decision or notice from panel that approval was given by the Registration Committee; and any documentation supporting the	Deloitte noted 4 applications during the period which were referred to the Registration Committee because the Registrar recommended terms, conditions and limitations be imposed. College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>conditions, or limitations imposed and the applicant consents to the imposition?</i>	where only minor re-occurring items are preventing the applicant from obtaining certificate (i.e. applicant only needs to take the jurisprudence and ethics course). The authorities granting the Registrar power to make these types of decisions are documented in Registration Committee minutes.	applicant's consent to the imposition. For any applications selected where Registrar was not required to receive approval to impose terms, review minutes where authority was granted to Registrar by Registration Committee.	Deloitte noted 9 applications during the period where terms, conditions and limitations were imposed by the Registrar. Appropriate documentation was reviewed to ensure authority was granted by Committee. College is in compliance with identified procedures.
5		<i>15(5): Do 17-subsection 2 and 17-subsection 3 apply with respect to the panel mentioned in 15-subsection 4?</i>	17(2) is followed by College for 15(4) as the Registration Committee consists of 4 members. Three of these members are dentists and one member is appointed by the Lieutenant Governor in Council (public representative). 17(3) is also followed with respect to 15 (4): three members of a panel constitute a quorum and must be present before the panel can deal with an application and render a decision.	For items selected under Step 4, review the minutes/report of decision to ensure that applications were reviewed by a panel that met requirements of 17(2) & 17(3).	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
6	Access to Records	<i>16: Upon the request of the applicant, did the Registrar provide all of the information and a copy of each document that the College has, that is deemed relevant to the application?</i>	Applicants are entitled to receive copies of everything that the Registration Committee receives when formulating a decision. This is done automatically for each and without any fees being charged to applicant, unless the information is protected under 16(2) which restrict the College's ability to distribute information.	Review the copies of letters sent to applicants or other documentation in applicant file (for those applications that were referred to the Registration Committee for the period under audit) stating that applicant is entitled to seek and obtain all information that the College has relevant to the application. Review the applicant file for any correspondence from applicant requesting information.	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
7	Access to Records	<i>16(2): Did the Registrar refuse to give an applicant anything that may, in the Registrar's opinion, jeopardize the safety of any person?</i>	Where the College holds personal information about an individual, upon written request, the College may allow access to the information to that individual, unless providing access could reasonably be expected to interfere with the administration or enforcement of the Legislation or it is impractical or impossible for the College to retrieve the information. Examples where access may be denied include: a) Information contains references to another individual that cannot be severed; b) Disclosure may result in significant risk of harm to the requestor or a third party; c) Information was collected or created in the course of inspection, investigation, inquiry or assessment authorized by law; d) College did not create the record and it is appropriate for the individual to request access from the organization that created the record; e) Disclosure may defeat the purposes for which the information was collected; f) Information cannot be disclosed for legal, security or commercial proprietary reasons; g) Information is	Inquire with the Registrar to determine if Registrar refused an applicant file information during the period under review. For applications that were referred to the Registration Committee, review applicant files for any requests of information and evidence that applicant was denied access to information by the Registrar. Review copies of letters sent to the applicant from College to ensure College provided reasons and that they fall within examples listed in policy.	Based on testing performed, no such instances identified for the period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
			<p>subject to solicitor-client or other privilege; h) Information was generated in the course of a formal dispute or resolution request; i) The request is frivolous, vexatious, or otherwise an abuse of process. In the event, the College refuses to provide access to all of the personal information it holds, the College will provide reasons for denying access. The individual may then choose to file a complaint with the Registrar.</p>		
8		<p><i>17(1): When an application for registration is referred to the Registration Committee by the Registrar OR an application is referred back to the Registration Committee by the Board, does the panel (selected by the chair among members of the Committee) review it?</i></p>	<p>The Registration Committee reviews all applicants for registration on a case by case basis that the Registrar refers to it.</p> <p>Applications referred back to the Registration Committee by the Professional Health Appeal and Review board (which is an independent Health regulatory body) are rare as the board tends to agree with the College's decision. However, those applications that are referred back will be reviewed again by the Registration Committee and applicant will be notified of decision.</p>	<p>Select all applications referred to the Registration Committee during the audit period. Obtain the related minutes/report of decision to determine that application was reviewed by the Committee.</p> <p>Obtain a listing of all applications that were referred back to Registration Committee by the Professional Health Appeal and Review Board for the audit period. Review related minutes/report of decision to ensure that application was further reviewed by the committee.</p>	<p>Based on testing performed on applications referred to the Registration Committee by the Registrar, College is in compliance.</p> <p>No such instances of board requiring Registration Committee to review an application were noted for the period under review.</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
9		<i>17(2): Is the panel composed of at least three persons, one of whom is a person that is appointed by the Lieutenant Governor in Council?</i>	The Registration Committee consists of 4 members. Three of these members are dentists and one member is appointed by the Lieutenant Governor in Council (public representative).	Obtain a listing of Registration Committee/Panel members from College and ensure that panel consists of 4 members. Review evidence that 3 are dentists and public representative was appointed by Lieutenant Governor in Council.	College is in compliance with identified procedures.
10		<i>17(3): Do the three members of a panel constitute a quorum?</i>	Any three members of the panel constitute a quorum and must be present before the panel can deal with an application and render a decision.	Select all applications referred to the Registration Committee during the audit period, and review the minutes/report of decision by panel to determine whether the panel was made up of a quorum (i.e. 3 members present) when rendering its decision.	College is in compliance with identified procedures.
11	Internal Review or Appeal	<i>18: Can the applicant make written submissions to the panel within thirty days after receiving the notice under 15(3) or within any longer period the Registrar may specify in the notice?</i>	Each applicant has an opportunity to make written submissions prior to the Committee rendering its decision. In addition, applicants and their legal counsel are routinely offered the opportunity to personally attend to make oral representations should they wish to do so.	Select all applications referred to the Registration Committee during the audit period, and review applicant files for written submissions by applicants made within 30 days of notice under Step 3. Ensure submissions are included in materials for consideration by panel by reviewing Registration Committee binders.	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
12		<p><i>18(2): After considering the application and the submissions, did the panel make an order based on one of the following (1) Directing the Registrar to issue a certificate of registration, (2) Directing the Registrar to issue a certificate of registration if the applicant successfully completes examinations set or approved by the panel, (3) Directing the Registrar to issue a certificate of registration if the applicant successfully completes additional training specified by the panel, (4) Directing the Registrar to impose specified terms, conditions and limitations on a certificate of registration of the applicant and specifying a limitation on the applicant's</i></p>	<p>The panel after making reasonable efforts to consider all records, documents and submissions relevant to the application, may make an order doing any one or more of the following: (1) Directing the Registrar to issue a certificate of registration, (2) Directing the Registrar to issue a certificate of registration if the applicant successfully completes examinations set or approved by the panel, (3) Directing the Registrar to issue a certificate of registration if the applicant successfully completes additional training specified by the panel, (4) Directing the Registrar to impose specified terms, conditions and limitations on a certificate of registration of the applicant and specifying a limitation on the applicant's right to apply under 19-subsection 1 or, (5) Directing the Registrar to refuse to issue a certificate of registration. Note: The panel cannot do anything that the Act does not allow it to do and is bound strictly by Statute & Regulations.</p>	<p>Select all applications referred to the Registration Committee during the audit period. Review the panel minutes of decision and any supporting documentation in file to determine that the decision rendered by the panel falls into 1 of the 5 acceptable categories listed.</p>	<p>College is in compliance with identified procedures.</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>right to apply under 19-subsection 1 or, (5) Directing the Registrar to refuse to issue a certificate of registration?</i>			
13		<i>18(3): Can the panel direct the Registrar to issue a certificate of registration to an applicant who does not meet a registration requirement unless the requirement is prescribed as a non-exemptible requirement (in accordance with subsection 2)?</i>	The Registration Committee reviews all applicants for registration on a case by case basis that the Registrar refers to it. It uses its discretion where applicable, namely where issues are an "exemptible" matter in the Registration Regulation. According to the Dentistry Act 1991, the only non-exemptible requirement is S16 (1)2 (for general) S18 (2), (3) (4) for specialty.	Select all applications referred to the Registration Committee during the audit period and for any applications processed where the Committee directed Registrar to issue a certificate of registration to an applicant, who does not meet a registration requirement, review the regulation and Committee minutes/report of decision to ensure that the requirement was exemptible, and Committee's support for requirement being waived.	Deloitte noted 3 applications where committee directed the Registrar to issue a certificate to an applicant who did not meet an exemptible requirement. College is in compliance with identified procedures.
14		<i>18(4): Did the panel, with the consent of the applicant, direct the Registrar to issue a certificate of registration with the terms, conditions and limitations</i>	The panel of the Registration Committee may be of the opinion that before it registers an applicant, it requires him or her to complete an examination or have further training. This may occur where Committee determines that member requires rehabilitation in one or	Select all applications referred to the Registration Committee during the audit period and for any applications where terms, conditions and limitations were specified by the panel, check that evidence of	Deloitte noted 3 applications where the Committee directed the Registrar to issue a certificate with terms and conditions imposed. College is in

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>specified by the panel imposed?</i>	more areas of dentistry. Where this occurs, the applicant will be asked to confirm in writing that he/she accepts the terms before a certificate of registration is processed. If the applicant does not consent to the terms, the Registration Committee will be notified and another formal order made with reasons and the appeals process.	consent of the applicant was received.	compliance with identified procedures.
15		<i>19(1): Can a member apply to the Registration Committee for an order directing the Registrar to remove or modify any term, condition or limitation imposed on the member's certificate of registration as a result of the registration proceeding?</i>	A member can apply to the Registration Committee to have a term removed or modified. The Registrar will receive the request from the member and will automatically forward it to the Registration Committee as the Registrar has no authority to remove or modify terms. The Registration Committee will then review the order to determine whether it is appropriate to have term removed or modified depending on whether circumstances have changed or new information has been received.	For any members who applied to Registration Committee for an order to remove or modify a term during the period, review copies of the notices sent to members (if any) notifying them that their request was sent to Registration Committee.	Deloitte noted 2 members during the period who requested the Committee to remove a term imposed on their certificate. College is in compliance with identified procedures.
16		<i>19(2): Is the right to apply under subsection 1 subject to any limitation in the order imposing the term, condition, or</i>	On occasion, the right to apply under 19 subsection 1 will be subject to a limitation in the order imposing the term or condition. For example, an applicant may apply to have the restriction to practice only with	For any members who applied to Registration Committee for an order to remove or modify a term during the period, review the original order minutes to ensure that "new"	No such instances were identified for the period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>limitation or to which the member consented and to any limitation made under subsection 7 in the disposition of a previous application under this section?</i>	supervision removed. A possible limitation imposed restricting applicant from being able to apply to remove term may be that applicant may have to satisfy a set # of clinical hours of supervision before this condition may be lifted.	decision rendered was consistent with any limitations imposed on original order or to which the member consented, and to any limitation made under subsection 7 in the disposition of a previous application under this section.	
17		<p><i>19(3): Are the applications to the Registration Committee under 19(1)</i></p> <p><i>Application for variation</i></p> <p>Or <i>applicants referred back to the Registration Committee by the board reviewed by the panel selected by the chair from among the members of the committee?</i></p>	<p>A member can apply, and the Panel of the Registration Committee will review the order to determine whether it is appropriate to have the term removed or modified depending on whether circumstances have changed or new information has been received. Once the decision has been made, the member will be notified through a formal notice of order. Reasons for the order will be sent if the request has been refused.</p> <p>Member requests referred back to the Registration Committee by the Professional Health Appeal and Review board are rare as the board tends to agree with the College's decision. However, those member requests that are referred will be reviewed again by the Registration Committee and</p>	<p>For any members who applied to Registration Committee for an order to remove or modify a term during the period, review Registration Committee minutes to ensure review by panel.</p> <p>Obtain a listing of all member requests that were referred back to Registration Committee by the Professional Health Appeal and Review Board for the audit period. For any applications that relate to board ordering the Registration Committee to review an applicant's request to removal/modify a term, review Registration Committee minutes to ensure that application was further reviewed by panel of Registration</p>	<p>Based on testing performed, College is in compliance.</p> <p>No such instances were identified for the period under review.</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
			applicant notified of decision.	Committee.	
18		<i>19(4): Do 17-subsection 2 and 17-subsection 3 apply with respect to the panel mentioned in subsection 3?</i>	<p>17(2) is followed by College for 19(3) as the Registration Committee consists of 4 members. Three of these members are dentists and one member is appointed by the Lieutenant Governor in Council (public representative).</p> <p>17(3) is also followed with respect to 19(3): three members of a panel constitute a quorum and must be present before the panel can deal with an application and render a decision.</p>	For the member requests selected in Step 17, review minutes of meetings/decision by Committee to obtain assurance that those applications were reviewed by a panel that met requirements of Step 9 & Step 10.	College is in compliance with identified procedures.
19	Internal Review or Appeal	<i>19(5): Can an applicant make written submissions to the panel?</i>	Each member has an opportunity to make written submissions prior to the Committee rendering its decision. This is communicated to applicants either through a formal notice or informally. In addition, applicants and their legal counsel are routinely offered the opportunity to personally attend to make oral representations should they wish to do so.	For the member requests selected in Step 17, review copies of formal notices or informal evidence sent to applicants notifying them of their right to make a written submission to the Committee. Review member files for written submissions by members and ensure included in materials for consideration by Committee by reviewing Registration Committee binders.	<p>Deloitte noted that all samples selected in step 17, included written submissions made to the committee.</p> <p>College is in compliance with identified procedures.</p>
20		<i>19(6): After considering the application</i>	The Registration Committee after considering the application and	For the member requests selected in Step 17, review the Committee	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>and the submissions, did the panel make an order doing any one of the following (1) Refusing the application, (2) Directing the Registrar to remove any term, condition, or limitation imposed on the certificate of registration, (3) Directing the Registrar to impose terms, conditions or limitations on the certificate of registration?</i>	submissions, and considering or making reasonable efforts to consider all records, documents and submissions relevant to the application, may make an order doing any one or more of the following: (1) Refusing the application, (2) Directing the Registrar to remove any term, condition, or limitation imposed on the certificate of registration, (3) Directing the Registrar to impose terms, conditions or limitations on the certificate of registration. Once the order has been made, the applicant will be notified through a formal notice of order along with the reasons for the decision.	minutes of meeting/decision to ensure that decision rendered by committee falls into 1 of the 3 acceptable categories listed.	
21		<i>19(7): Did the panel, in disposing of an application under this section, fix a period of time longer than 6 months during which the applicant may not apply under 19(1)</i>	When a member request is disposed of under this section or alternatively the request was refused with respect to removing or modifying a term or condition, members are notified through a letter order of committee and made aware that they cannot reapply under 19(1) for a period of 6 months.	From selections made above in Step 17, review copies of notices sent to members to ensure that notice states minimum period before reapplying is 6 months.	No instances identified for the period under audit given that both member requests to have conditions removed were approved by the committee. College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
22	Timely, Decisions, Responses and Reasons	<i>20: Did the panel give the applicant notice of an order that it makes under 18(2) or 19(6) and written reasons for it if the order (a) directs the Registrar to refuse to issue a certificate of registration; (b) directs the Registrar to issue a certificate of registration if the applicant successfully completes examinations or additional training; (c) directs the Registrar to impose terms, conditions and limitations on a certificate of registration of the applicant; or (d) refuses an application for an order removing or modifying any term, condition, or limitation imposed on a certificate or registration?</i>	<p>When an applicant or member has been denied registration, or denied removal or modification of a term, limitation or condition imposed, the member will be sent a Notice or Order with Reasons for the decision along with his or Notice of Rights of Appeal to the Health Profession Appeal and Review board.</p> <p>Applicants that have been approved for a registration certificate with or without imposed terms will also be conveyed through a formal notice of the order to member.</p>	For selections made under Step 12 and Step 20, review the copy of notice of the order to determine that notice was sent to applicant or member. If order was to refuse applicant or member of certificate or removal of a term, ensure reasons were clearly given for decision in notice.	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
23	Timely, Decisions, Responses and Reasons & Information on Appeals Rights	<i>20(2): Did the notice under subsection 1 inform the applicant of the order and of the provisions of 21-subsection 1 and 21-subsection 2?</i>	Applicant is always notified of order along with reasons for the order (in particular when applicant is denied registration or terms, conditions or limitations imposed) through a written notice. The notice will also include information regarding applicant's rights to provisions 21(1) and 21(2).	Review copies of notices sent to applicants for the applications selected in Step 22 above, to ensure that order and reasons were clearly stated and consistent with the documentation in the file (i.e. minutes of panel order). Ensure that Steps 24 & Step 25 was conveyed to applicant in notice if order falls within (a) to (d) as listed in Step 22.	Deloitte noted that 1 applicant was refused a certificate during the period under review and that this requirement was met.
24	Information on Appeals Rights	<i>21(1): Can an applicant who has been given notice of an order under 20-subsection 1 require the Board to hold a review of the applicant and the documentary evidence in support of it, or a hearing of the application, by giving the Board and the Registration Committee notice in accordance with subsection 2?</i>	When a decision to refuse is given by the Registration Committee, it always includes the applicant's right to a further appeal to Health Professions Appeal and Review board (HPARB) along with instructions on how to proceed. The committee is not involved in the independent decision making process of the HPARB.	For selections made in Step 20 where order was to refuse either registration or removal of a term, inquire with Registrar to determine if any appeals were made to HPARB during the period. Review files for any correspondence by applicant requesting Board review. Review evidence that a review or hearing was held by the HPARB by viewing the decision report.	No such instances were identified for the period under review.
25	Information on Appeals Rights	<i>21(2): Is the notice under subsection 1 a written notice, and was it given within thirty days</i>	Applicant's right to request a hearing by HPARB through a written notice within 30 days after receiving College's order is clearly stated on all	For selections made in 20, review applicant files to determine if a written notice was received by applicant	No such instances were identified for the period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>after the notice under 20-subsection 1, specifying whether a review or hearing is required?</i>	notices of Orders sent to applicants by Registrar. Once the decision of the Registration panel has been mailed, applicant may within 30 days of receipt, request that the HPARB hold a review or a hearing respecting the decision of the Registration panel.	requesting board to hold a review or hearing, and that it was received within 30 days after the notice in 21 was given.	
26		<i>21(3): After the Registration Committee receives a notice that an applicant requires a hearing or review, does it give the Board a copy of the order made with respect to the application, the reasons for it and the documents and things upon which the decision to make the order was based (within 15 days after receiving the notice)?</i>	If the HPARB is requested to review a decision, the Registrar shall give to the HPARB and applicant within 15 days, a copy of the order made with respect to the application, the reasons for it and the documents and things upon which the decision to make the order was based. Essentially, this is an indexed copy of the master document that was put before the panel of the Registration Committee.	Review Policy and Procedures binder for Registration Practices to ensure that Registrar staff is aware of this protocol. Inquire with Registrar staff to determine their familiarity with this practice and whether it actually occurs. Examine correspondence between HPARB & College to determine whether this information has been provided by College to HPARB.	Deloitte noted one instance in which HPARB requested to review a decision and that the college was compliant by providing the information used to make its decision, within 15 days to the HPARB. (Note: The HPARB request occurred during the period under review; however the application relating to this request was not made during the period under review.)

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
27		<p><i>21(4): Is an order of a panel only carried out when (a) the applicant has given the Registrar notice that the applicant will not be requiring a review or hearing, (b) thirty-five days have passed since the notice of the order was given under 20-subsection 1 without the applicant requiring a review or hearing, or (c) the Board has confirmed the order?</i></p>	<p>If the Registrar has not heard from the applicant through a written notice requesting a review or hearing by the HPARB within 35 days of the notice of order being given, the order will be carried out.</p> <p>For those applications requiring a board review or hearing, the order will be carried out when the Board has confirmed the order made by the panel of Registration Committee.</p>	<p>Select all applications referred to the Registration Committee during the audit period. For any files, where application was refused for registration or removal/modification of a term, review file for any</p> <ul style="list-style-type: none"> a) applicant consent of order, b) HPARB notice confirming order by Registration Committee or c) Written notice by applicant requesting hearing or review by HPARB <p>To determine that orders are only carried out after 35 days if none of the above occurs.</p>	<p>No such instances were identified for the period under review.</p>
28		<p><i>22(2): Do the following provisions apply with necessary modifications to a hearing or review: (1) 38-Subsection 4 (exclusion from panel), (2) Section 42 (disclosure of evidence), (3) Section 43 (no communication by panel members), (4) Section 50 (members of</i></p>	<p>It is the College's understanding that the Health Profession Appeals and Review Board (which is an independent body from the RCDS) adhere to the required provisions of the RHPA when conducting a hearing or review of an application.</p> <p>It is also stated on the HPARB website that the HPARB follows the RHPA.</p>	<p>Select all applications referred to the Registration Committee during the audit period. For any applications requesting HPARB review or hearing, read the related minutes of decision by HPARB to determine if the provisions listed apply and board's adherence to them.</p> <p>Visit the HPARB website to</p>	<p>No such instances were identified for the period under review.</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>panel who participate), (5) Section 55 (release of evidence)?</i>		determine if HPARB policies and procedures are evident and that HPARB follows the RHPA.	
29		<i>22(3): Do the following provisions also apply with necessary modifications to a hearing: (1) Section 45 (hearings open), (2) Section 47 (sexual misconduct witnesses), (3) Section 48 (transcript of hearings)?</i>	It is the College's understanding that the Health Profession Appeals and Review Board (which is an independent body from the RCDS) adhere to the required provisions of the RHPA when conducting a hearing of an application. It is also stated on the HPARB website that the HPARB follows the RHPA.	Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB hearing, read related minutes of decision by HPARB to determine if the provisions listed apply and board's adherence to them. Visit the HPARB website to determine if HPARB policies and procedures are evident and that HPARB follows the RHPA.	No such instances were identified for the period under review.
30		<i>22(3.1): Do the following provisions of the Statutory Powers Procedure Act also apply with necessary modifications to a review by the Board: (1) Section 21.1 (correction of errors), (2)</i>	It is the College's understanding that the Health Profession Appeals and Review Board (which is an independent body from the RCDS) adhere to the required provisions of the Statutory Powers Procedures Act when conducting a review of an application.	Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB review, read related minutes of decision by HPARB to determine if the provisions listed	No such instances were identified for the period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>Section 25.1 (rules)?</i>		apply and board's adherence to them.	
31		<i>22(4): Are the findings of fact in a hearing based exclusively on evidence admissible or matters that may be noticed under sections 15, 15.1, 15.2 and 16 of the Statutory Powers Procedure Act?</i>	It is the College's understanding that the Health Profession Appeals and Review Board (which is an independent body from the RCDS) adhere to the required provisions of the Statutory Powers Procedures Act when conducting a hearing of an application.	Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB hearing, read Decision minutes by HPARB to determine if evidence submitted adhered to the provisions listed. Alternatively, or in addition, review the evidence submitted by both parties at Registrar office.	No such instances were identified for the period under review.
32		<i>22(5): Are the findings of fact in a review based exclusively on the application and documentary evidence admissible or matters that may be noticed under sections 15, 15.1, 15.2 and 16 of the Statutory Powers Procedure Act?</i>	It is the College's understanding that the Health Profession Appeals and Review Board (which is an independent body from the RCDS) adhere to the required provisions of the Statutory Powers Procedures Act when conducting a hearing of an application.	Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB review, read decision minutes by HPARB to determine if evidence submitted adhered to the provisions listed. Alternatively, or in addition, review the evidence submitted by both parties at Registrar office.	No such instances were identified for the period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
33		<p><i>22(6): Does the Board, after the hearing or review, make an order doing any one or more of the following: (1) Confirming the order made by the panel, (2) Requiring the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant if the applicant successfully completes any examinations or training the Registration Committee may specify, (3) Requiring the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant and to impose any terms, conditions and limitations the Board Considers appropriate, (4) Referring</i></p>	<p>Per the HPARB website, after a hearing or review, the Board will make an order with written reasons for its decision and provide it to the parties. The Board may: (1) Confirm the order made by the panel, (2) Require the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant if the applicant successfully completes any examinations or training the Registration Committee may specify, (3) Require the Registration Committee to make an order directing the Registrar to issue a certificate of registration to the applicant and to impose any terms, conditions and limitations the Board Considers appropriate, (4) Refer the matter back to the Registration Committee for further consideration by a panel, together with any recommendations the Board considers appropriate.</p> <p>The board gives its decision and reasons in writing to the applicant and to the College. The decisions of the Board are typically issued several months after</p>	<p>Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB hearing or review, read the Board's decision and reasons in writing to determine that decision made falls into 1 of the 4 acceptable categories. In addition, confirm that Registrar complied with Board's decision. For example, if decision by board was to require Registration Committee to make order directing Registrar to issue certificate, review Registrar notification to applicant of issuance of certificate.</p>	<p>No such instances were identified for the period under review.</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>the matter back to the Registration Committee for further consideration by a panel, together with any recommendations the Board considers appropriate?</i>	the date of the review.		
34		<i>22(7): Did the Board make an order under paragraph 3 of subsection 6 only in cases where the Board finds that the applicant substantially qualifies for registration and that the panel has exercised its powers improperly?</i>	The HPARB rarely disagrees with the College's order regarding an applicant. However, if the board did ever disagree with the College's order, it could use paragraph 3 of subsection 6 provided it has support for this decision.	Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB hearing or review, read the Board's decision and reasons in writing to determine cases where the Board finds that the applicant substantially qualifies for registration and that the panel has exercised its powers improperly. Ensure that support by the board has been provided for the decision (i.e. reasons). Ensure that certificate was registered to applicant by reviewing notice sent.	No such instances were identified for the period under review.

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35		<i>22(8): Does the Board require the Registration Committee to direct the Registrar to issue a certificate of registration to an applicant who does not meet a registration requirement that is prescribed as a non-exemptible requirement (i.e. when the Board makes an order under subsection 6)?</i>	The Board in making an order shall not require the Registration Committee to direct the Registrar to issue a certificate of registration to an applicant who does not meet a registration requirement that is prescribed as a "non-exemptible" requirement.	Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB hearing or review where Board required the Registration Committee to direct the Registrar to issue a certificate of registration to an applicant, review the board's decision and reasons in writing to determine that applicants who did not meet a non-exemptible requirement were not issued a certificate.	No such instances were identified for the period under review.
36		<i>22(9): Are both the College and the applicant parties to a hearing or review?</i>	Per HPARB Rule of Practice 2007, the board shall provide a notice of receipt to the parties that will indicate whether it is a registration review or hearing. A review will be closed to the public and the parties cannot attend unless board directs otherwise. A hearing will be open to the public unless Board directs otherwise.	Inquire with College to determine that only hearings can be subject to College and applicant being present. Select all applications referred to the Registration Committee during the audit period. For any applications requesting a HPARB hearing or review, read the Board's minutes of decision of hearing to determine whether College	No such instances were identified for the period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
				and applicant attended.	
37	Information for Applicants	<i>22.2: Does the College provide registration practices that are transparent, objective, impartial and fair?</i>	<p>The College aims to be transparent and fair as possible with applicants in the way it describes the registration application process. Information sheets are available which are continuously honed as processes evolve and feedback from applicants is received. The sheets lay out the registration practices and requirements for applicants in a step by step fashion.</p> <p>The website also displays a variety of information regarding the registration process:</p> <ol style="list-style-type: none"> 1. Forms are available on the website as they are electronically sent out in response to e-mail inquiries and available at College for pick-up or mailed 2. Registration requirements and process are also clearly laid out for applicants 3. There is section dedicated to the Internationally trained/educated which specifically 	<p>Visit the College website to determine if all required information regarding the registration process is readily available, accessible and clear. Review the information sheets to ensure that registration practice and requirement are clearly laid out.</p> <p>Obtain copy of registration requirements from College and compare to the Dentistry Act to ensure all requirements from College come from the Dentistry Act.</p>	Based on testing performed, College is in compliance.

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			<p>lays out requirements and application process for these applicants</p> <p>4. Also sections dedicated to the Jurisprudence and Ethics course, Letter or Standing & Registration Regulations</p> <p>Staff are also well-trained and proficient in providing verbal answers to phone or in person enquiries The College also ensures that registration practices are fair and impartial by following the Registration Regulations (i.e. Dentistry Act). While the College recommends requirements, it is ultimately the Ministry of Health and Long Term Care's choice to enact recommendations into legislation. Note that cases are reviewed on a case by case basis and exemptible requirements waived if Registration Committee sees fit which is the Registration's method of ensuring that practices are fair and objective.</p>		

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38	Information for Applicants	<i>22.3: Does the College provide information to individuals who are applicants for registration with respect to the requirements for registration, the procedures for applying and the amount of time that the registration process usually takes?</i>	Registration information addressing requirements for registration, the procedures for applying & the amount of time that the registration process takes is readily available to all applicants through the College website. Applicants can also obtain a Registration Information document depending on the type of license which also lists the requirements needed, procedures, and other information from the College website. This information is also available at the College office and can be mailed to the applicant.	Review the website content to determine that requirements, procedures and other pertinent information is readily accessible and clearly laid out.	College is in compliance with identified procedures.
39	Information for Applicants	<i>22.4: Does the College make information publicly available on what documentation of qualifications must accompany an application and what alternatives may be acceptable to the College if an applicant cannot obtain the required documentation for reasons beyond his or her control?</i>	Information on what document qualifications must accompany an application is made publicly available via the College website. With respect to acceptable alternatives, the College does provide for exceptions on a case by case basis. However, alternatives are not publicly listed because it is 1) dependent on where applicant is coming from and 2) Given that there are numerous countries and a different alternative available for each, it would not be practical to list them all	Visit the College website and the Internationally Educated/Trained section to determine that information is publicly available on what documentation of qualifications must accompany an application.	College is in compliance with identified procedures.

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			<p>especially as situations continuously change.</p> <p>The College keeps detailed track of what information can be obtained from countries based on history. Therefore, only when a situation warrants, and the College knows from experience that the documentation cannot be obtained, does the College provide an acceptable alternative to an applicant. A common case is when an applicant from a war-torn country is not able to obtain an original letter from his/her home country. Depending on where the applicant is from, the College would know what the alternative could be.</p>		
40	Assessment of Qualifications	<p><i>22.4(2): If the College makes its own assessment of qualifications, does it do so in a way that is transparent, objective, impartial and fair? If the College relies on a third party to assess qualifications, does it take reasonable measures to ensure that the third party makes the</i></p>	<p>The College does not set its own qualifications. Qualifications are recommended by the College but are ultimately approved and enacted by legislation (i.e. the MOHLTC). All the requirements in the registration information sheets are derived from the Provincial Dentistry Act.</p> <p>With respect to third parties: The college relies on two national examiners, one for general practitioners, and one for specialists.</p>	<p>Obtain copy of registration requirements from College and compare to the Dentistry Act to ensure all requirements from College are from the Dentistry Act.</p> <p>Review copies of contracts between the College and national examiners which specify standards that the national examiners are expected to abide by (if any) as well as copies of correspondence regarding RHPA practices from</p>	College is in compliance with identified procedures.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<p><i>assessment in a way that is transparent, impartial and fair?</i></p>	<p>In each case, examination is "non-exemptible" requirement. 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.</p> <p>The Royal College of Dentists of Canada was set up by Act of Parliament in 1965 and is responsible for establishing standards for speciality areas of dentistry. Both bodies are named in Ontario's Registration Regulation and their role as examiners recognized. Examination development is complicated and requires expertise which is why all the Colleges use an external examining body that specializes in this field. Validation obtained from Human Rights expert that requiring examination to ensure competencies is "fair" and within mandated responsibility of regulatory body. The College takes reasonable measures to ensure that third party makes</p>	<p>College to NDEB & RCDC which will provide evidence that College does take measures to ensure third party comply with fair practices.</p>	

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
			<p>assessment in a way that is transparent, impartial and fair by requesting both bodies to submit to the College annual reports. The College also requests for both bodies to submit information on how they comply with fair registration practices. In addition, the College has representation on both boards which acts further as a monitoring and guidance tool. Both external bodies responsible for setting competencies (NDEB & RCDC) perform every year a review of the certification and examination procedures and adjustments made to improve the validity and reliability of examinations. In addition to these internal reviews, the NDEB has invited several external evaluations.</p> <p>Transparency- both examination bodies have website and information packages that describe the examination formats, suggested topics for study, dates, fees, history, by-laws, government appointed authority and appeals process.</p>		
41	Training	<i>22.4(3): Does the College ensure that individuals</i>	a) The college has a responsibility to ensure that only competent staff is hired and the	Review training and orientation policies for Registrar staff and	College is in compliance with identified procedures.

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		<p><i>assessing qualifications and making registration decisions or reviewing decisions have received training that includes, where appropriate (a) training on how to assess such qualifications and make such decisions; (b) training in any special considerations that may apply in the assessment of applications and the process for applying those considerations ?</i></p>	<p>starting point is using published job descriptions. Staff members receive orientation and training when they are hired. Contractual agreements are signed respecting their fiduciary responsibilities and privacy legislation. Registration staff are well directed and comfortable in approaching the supervisor or manager whenever questions arise. There are also annual performance reviews. Staff do not access qualifications but follows the regulated requirements for registration. Assessing qualifications is left to those who are experts in the field, namely the Universities administering the educational programs and the national examiners. b) Applicants who appeal a decision of the Registrar are referred to the Registration Committee who will conduct a review. The Committee also receives training and orientation with respect to this.</p>	<p>Registration Committee to ensure that individuals assessing qualifications are competent. Discuss job duties with a sample of College employees and compare to staff roles in policies and procedures binder to ensure that only individuals who are qualified are making registration decisions.</p>	
42		<p><i>22.6: Does the College undertake reviews of its registration practices at such times as the Fairness Commissioner</i></p>	<p>N/A- To date, the College has not been asked to undertake a review of its registration practices by the Fairness Commissioner.</p>	<p>Review copy of the letter sent to College from Fairness Commissioner specifying review to be done if available. Review a copy of the review</p>	<p>No such instances identified for period under review. However, the College continually undertakes</p>

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>may specify to ensure that the registration practices are transparent, objective and fair?</i>		report submitted to the Fairness Commissioner to ensure that transparency, objectivity and fairness of registration practices was addressed by the College.	(ongoing policy of self review) a review of its registration practices.
43		<i>22.6(2): Does the review include an analysis of the following: (a) the extent to which the requirements for registration are necessary for or relevant to the practice of the profession; (b) the efficiency and timeliness of decision-making; and (c) the reasonableness of the fees charged by the College in respect of applications?</i>	N/A- To date, the College has not been asked to undertake a review of its registration practices by the Fairness Commissioner and thus no formal review has been done.	Review copy of the review report submitted to the Fairness Commissioner to ensure that analysis of the following was addressed: (a) the extent to which the requirements for registration are necessary for or relevant to the practice of the profession; (b) the efficiency and timeliness of decision-making; and (c) the reasonableness of the fees charged by the College.	No such instances identified for period under review.
44		<i>22.6(3): Did the College file a copy of the results of the review with the Fairness Commissioner within 30 days after the completion of the review?</i>	N/A- To date, the College has not been asked to undertake a review of its registration practices by the Fairness Commissioner and thus no formal review has been done, nor has the College filed the results to the Fairness Commissioner.	Confirm with the Fairness Commission that the results of the review were filed with the Fairness Commissioner within 30 days after the completion of the review OR alternatively by reviewing any documentation received from the	No such instances identified for period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
				FC to College confirming receipt of the report.	
45		<i>22.7: Does the College prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify?</i>	N/A- To date, the College has not been asked prepare a fair registration practices report annually or when Fairness Commissioner specifies and thus no report has been prepared.	Inquire with College to determine how often a fair registration practices report is prepared, the process and whether the reports are filed to the Fairness Commission.	No such instances identified for period under review.
46		<i>22.7(2): In cases where the College combines its fair registration practices report with such other reports of the College as the Fairness Commissioner may permit, is the audit confined to those parts that relate to registration practices?</i>	N/A- To date, the College has not prepared a fair registration practices report.	Inquiry will be made to determine if the fair practices report was combined with other reports of the College. If this was the case, ensure that audit was only confined to registration practices by reviewing the report.	No such instances identified for period under review.
47		<i>22.7(3): Did the Fairness Commissioner require that the College provide them with reports or information relating to the College's compliance</i>	N/A- To date, the Fairness Commissioner has not required the College to provide them with reports or information relating to the College's compliance with 15-22.11 and the regulations and thus the College has not	Inquire with College to determine whether Fairness Commissioner required College to provide compliance report with respect to sections 15-22.11. If a report was prepared,	No such instances identified for period under review.

Step	Evaluation Criteria Requirement is Addressing (if applicable)	Requirement	RCDSO's Procedure to Address Clause	Audit Procedure to Test Compliance with RCDSO Procedure	Deloitte Observations/ Conclusions
		<i>with sections 15 to 22.11 and the regulations? Does the College prepare and file reports with, or provide the information to, the Fairness Commissioner ?</i>	prepared and filed reports to Fairness Commissioner.	review to ensure that sections 15-22.11 were addressed in report. If possible, confirm with Fairness Commissioner to determine if Compliance report required.	
48		<i>22.7(4): Are the reports and information required under subsection 3 in addition to the reports required under subsection 1 and section 22.8?</i>	N/A- To date, the Fairness Commissioner has not required the College to provide them with reports other than those under subsection 1 & 22.8.	Inquire with College to determine if reports in addition to the reports required under subsection 1 and section 22.8 were required by Fairness Commissioner. If this is the case, review the letter from the Fairness Commissioner and the related report prepared by College.	No such instances identified for period under review.
49		<i>22.9: Does the College file its fair registration practices reports with the Fairness Commissioner by the dates specified by the Fairness Commissioner ?</i>	N/A- To date, the College has not been required by Fairness Commissioner to submit a fair registration practices report and thus no dates have been specified.	If possible, confirm with Fairness Commissioner to determine if Compliance report was required and whether it was made in a timely manner to Fairness Commissioner. Alternatively, review notice from Fairness Commissioner stating the date the report required and inquire with Registrar when report was sent.	No such instances identified for period under review.

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50		<i>22.9(2): Does the college make reports filed under subsection 1 available to the public?</i>	N/A- To date, the College has not been required by the Fairness Commissioner to submit a fair registration practices report and thus no report was made available to the public.	Ensure that report is readily available to public by testing whether report can be readily accessed by D&T.	No such instances identified for period under review.
51		<i>22.10: Are the reports and certificates that are required under sections 22.7 and 22.8, (and under the regulations) in the form, and contain the information specified by the Fairness Commissioner or the regulations?</i>	The report under 22.7 is N/A as the Fairness Commissioner has not requested a Fair Practices report to date.	Review reports and certificates that have been required under sections 22.7, 22.8 to determine that reports are in the form and contain the information specified by the Fairness Commission or regulations.	No such instances identified for period under review.
52		<i>22.10(2): Do the reports prepared by the College, the Fairness Commissioner or an auditor under sections 22.6 to 22.8 contain personal information (despite subsection 1)?</i>	22.6 & 22.7 are N/A as reports have not been required by Fairness Commissioner to date. The audit report per 22.8 will be reviewed carefully by both the College and the auditors to ensure that no personal information is disclosed.	Review reports prepared by College and D&T to ensure that no personal information is disclosed.	No such instances identified for period under review.
53		<i>22.11: Does the fair practices report include a statement certifying that all the information required to be</i>	N/A- To date, the Fairness Commissioner has not required the College to submit a fair registrations report and thus no statement required.	Review the fair practices report to determine that a statement by College was included certifying that all information required to be provided in the	No such instances identified for period under review.

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		<i>provided in the report has been provided and that the information is accurate?</i>		report has been provided and that information is accurate.	
54		<i>22.11(2): Does the person with authority to sign on behalf of the College sign the statement required by subsection 1?</i>	N/A- To date, the Fairness Commissioner has not required the College to submit a fair registrations report and thus no statement required.	Review the fair practices report to determine that statement specified per 22.11 was signed by person of the College with authority.	No such instances identified for period under review.

Appendix 2

Audit report

Auditors' Report

To the Members of Council of the
Royal College of Dental Surgeons of Ontario

We have audited the Royal College of Dental Surgeons of Ontario (the "College") compliance for the 12 month period from July 16, 2007 to July 15, 2008 with the provisions described in Sections 15-22, 22.2-22.4, 22.6-22.7 and 22.9-22.11 in Schedule 2 of the Regulated Health Professions Act, 1991 of the Health Professions Procedural Code (the "Code"). Compliance with the provisions established by the Code is the responsibility of the College. Our responsibility is to express an opinion on this compliance based on our audit.

We conducted our audit in accordance with Canadian generally accepted auditing standards. Those standards require that we plan and perform an audit to obtain reasonable assurance whether the College complied with the provisions established in the Code referred to above. Such an audit includes examining, on a test basis, evidence supporting compliance, evaluating the overall compliance with the Code and where applicable, assessing the accounting principles used and significant estimates made by the College.

In our opinion, for the 12 month period from July 16, 2007 to July 15, 2008, the College was in compliance, in all material respects, with the provisions described in Sections 15-22, 22.2-22.4, 22.6-22.7 and 22.9-22.11 in Schedule 2 as described in the Regulated Health Professions Act referred to above.

Deloitte & Touche LLP

Chartered Accountants
Licensed Public Accountants
November 7, 2008

Appendix 3

General observations

General observations in respect of evaluation of registration practices

Based on procedures performed during the course of our audit we have concluded that overall, the registration policies and procedures of the College appear to be fair, transparent and reasonable. We noted during the course of our audit that both domestic and internationally trained applicants were admitted for registration within the College. We provide the following general commentary under the various evaluation criteria identified by the Office of the Fairness Commissioner.

Information for applicants

This criteria was specifically addressed through steps 37, 38 & 39 of the Audit program (Appendix I)

The College provides information about its registration practices to persons applying, or intending to apply, for registration through its website, and through enquiries in person or by telephone.

Information on registration which outlines the requirements for registration, the procedures for applying and the amount of time that the registration process takes is readily available to all applicants through the College's website.

The website presents a variety of information regarding the registration process, including the following:

1. Downloadable application forms (applications can also be mailed in response to e-mail inquiries, or are available at the College).
2. The registration requirements and the process, clearly laid out for applicants.
3. A section dedicated to internationally trained/educated applicants which specifically lays out requirements and the application process for these applicants.
4. Sections dedicated to providing information on the required Jurisprudence and Ethics course and Letter or Standing that all applicants are required to have, as well as the Registration Regulations that the College follows.

Applicants can also obtain a registration information sheet depending on the type of license they seek which also lays out the registration process and requirements for applicants in a step by step fashion. These forms are available on the website or at the College for pick-up.

Staff appear to be well-trained and proficient in providing verbal answers to phone or in person enquiries regarding the registration process and requirements.

A fee scale is provided on the registration information sheets with respect to the application, registration and annual membership fees that will be incurred by an applicant. Also, a fee scale stating the prorated membership fee depending on when an applicant is registered during the year is available.

Timely decisions, responses and reasons

This criteria was specifically addressed through steps 3, 22 & 23 of the Audit program (Appendix I).

It is our assessment that generally, the College makes registration decisions within a reasonable time. The following is a summary of the approximate times in which decisions, responses and reasons are given by the College.

Registration Step	Approximate Time
Application is processed	1 week
Applicant is notified that application has been registered by Registrar or referred to the committee through written notice	1 week
Applicant may make a written submission to the Committee	Within 30 days of receiving notice from College informing applicant that application has been referred to the Committee
Application is reviewed by the Committee	At the next Committee meeting (note they are normally held every 2 to 3 months or as needed)
Applicant notified of order made by Committee through written notice	Within 1 week of decision
If order was made by Committee to refuse application, formal reasons and appeals process sent to applicant	2-3 months following decision
Applicant may appeal order made by Committee to the board	Within 30 days of receiving formal notice of order and reasons from the College

Applicants are informed that the standard processing time for an application is three weeks at most. However, in practice it usually takes one week. The processing time starts at the point when all required documentation has been received by the College and the application is complete. There is no standard time with respect to when an application is assessed if the College is waiting for various pieces of documentation. The time could vary, as it is uncontrollable by the College as the documentation must come from a variety of sources, and it is ultimately the applicant's responsibility to ensure that all documents are sent to the Registrar. Consideration of an application does not begin until all required documentation is received.

Once an applicant is registered, he/she is immediately contacted without delay by phone or e-mail as well as being sent a written confirmation. For those applicants who are referred to the Registration Committee, the applicants are officially notified through a written notice or by informal means that their applications have been referred there.

After a Registration Committee order has been made, written responses to applicants are also made to inform applicants that registration has been approved or refused. For applications that have been refused by the Registration Committee, the formal written reasons and appeals process is also sent to the applicant. The reasons are clearly and specifically set out for each issue that caused the Committee to refuse registration. While the notification of the Committee's decision is given within one week of the decision, the formal notifications of the reasons for refusal typically takes 2-3 months. This length of time is required for legal purposes, as lawyers are involved in order to ensure proper documentation of the issues.

Internal review or appeal

This criteria was specifically addressed through steps 3, 11 & 19 of the Audit Program (Appendix I).

This criteria relates to any applications referred to the Registration Committee by the Registrar. It is the policy of the College that the Registrar cannot refuse an application without approval from the Committee.

If an applicant requires a review or appeal of the registration decision, he/she must request this review or hearing from the Professional Health Appeal and Review Board (HPARB), which is an independent forum for the public and Colleges. The Registration Committee will only provide an internal review from its original decision if requested by the HPARB.

The College effectively provides an internal review of its registration decisions in that any application who is rejected by the Registrar automatically goes to the Registration Committee. Further, if directed to do so by the HPARB, the Registration Committee will review a previous decision. Whether the application has been referred to the Registration Committee by the Registrar or the HPARB, the College will make its best effort to have the application reviewed at the next Registration Committee meeting. Regular meetings of the Registration Committee are held every few months but if required, additional special meetings have been scheduled occasionally to deal with pressing applications.

For applications that have been referred to the Registration Committee by the Registrar, the applicant will be notified through a formal notice that he/she has the right to make a written submission to the Committee within thirty days of receiving the notice. Applicants are also invited to attend the meeting and make an oral submission, which they quite often do.

Information on appeal rights

This criteria was specifically addressed through steps 38 & 39 of the Audit Program (Appendix I)

The College informs applicants of their rights to request a further review or appeal when a Registration Committee decision is made to refuse the applicant for registration or remove/ modify a term in the registration certificate. This occurs through a formal notice of the order when the reasons have been finalized by the Registration Committee and includes the applicant's right to a further appeal to HPARB, along with instructions on how to proceed. The applicant is also informed that once the decision of the Registration Committee has been mailed, the applicant may within 30 days of receipt, request that the HPARB hold a review or a hearing regarding the decision of the Registration Committee.

The HPARB Rules of Practice state that an applicant can make a written submission to the Board in support of the application within thirty days after receiving confirmation from the Board that the applicant will be granted a review or hearing.

The registration decision-makers are separate from the decision makers in the review and appeals of registration decisions as the committee is not involved in the independent decision making process of the HPARB.

Documentation of qualifications

The College makes available to the public its requirements of qualifications that must accompany an application through the College website and the registration information sheets.

With respect to requirements which may be satisfied through acceptable alternatives to the standard documentation, if applicants cannot obtain the standard documentation for reasons beyond their control, the College does provide for exceptions on a case by case basis. However, alternatives are not publicly listed because they are evaluated on a case by case basis. The Registration Committee uses its discretion, where applicable, namely where the issue is an "exemptible" matter in the Registration Regulation. Given that applications are received from a variety of individuals from numerous countries, all with different domestic training, it would also not be practical to list alternatives for each country, especially as situations continuously change. The applicant would need to contact the Registrar's office to obtain information regarding acceptable alternatives.

The College does track what information can be obtained from countries based on history. Therefore, only when a situation warrants and the College knows from experience that the documentation cannot be obtained, will the College provide an acceptable alternative to an applicant. A common case is when an applicant is from a war-torn country and is not able to obtain an original letter of standing from the regulatory body from his/her home country. The College may be willing to accept a sworn affidavit or in other situations applicants will be able to provide a multiplicity of alternative documentation specific to their country to support their claims.

Assessment of qualifications

This criteria was specifically addressed through step 40 of the Audit Program (Appendix I).

The responsibility of registering (licensing) and regulating dentists in the Province of Ontario has been given to the College. The entry to practice standards are codified in statutes by the Ministry of Health and Long term Care (MOHLTC) and based on nationally approved standards and measurements deemed necessary for public safety. All additions or amendments proposed by the College are vetted by the MOHLTC which completes an intense analysis of requested additions or amendments to the Regulations. Therefore, all requirements are derived from the Provincial Dentistry Act, 1991 (as amended from time to time through regulation). While the College does have an ability to request amendments to the Act, ultimate responsibility for the required qualifications rests with the Provincial Government.

All requirements are established for the purpose of ensuring public safety. In the table on page 48 we identify the requirements for obtaining both a general and specialty certificate. Items denoted as exemptible indicate requirements which can be waived by the Registration Committee if circumstances warrant. In these situations, the Registration Committee considers the circumstances of the individual and the nature of the "non-compliance" with the requirement. If, in the judgement of the Committee the "non-compliance" does not pose a risk to public safety the requirement may be waived. Note that the requirement to hold a degree in dentistry as evidence of successful completion of a course in dental studies of at least four years duration at a university-based dental school in the table below is shown as being exemptible. While the Dentistry Act does not indicate this as a non-exemptible requirement, the NDEB does require this in order to write the exam, which is a non-exemptible requirement per the Act.

The requirements identified as non-exemptible indicate those for which no exception can be made by the College. The non-exemptible requirements are as follows:

1. The requirement to hold a degree in dentistry as evidence of successful completion of a course in dental studies of at least four years duration at a university-based dental school is deemed necessary to ensure that the applicant has adequate training in all of the competencies which will be required for a career in dentistry. Ensuring that a dentist possesses these competencies is critical in protecting the public safety and is therefore considered fair.

Assessment of qualifications (continued)

2. The successful completion of the NDEB exam (required for both domestically and foreign trained applicants). The successful completion of an exam provides evidence that the individual possess competencies necessary to practice general dentistry at a level of standard deemed necessary in Canada. Given that the standards of training may vary significantly from country to country, the successful completion of the exam for foreign trained dentists who have already been licensed in their home country is deemed necessary to ensure that they are able to practice dentistry at the level required in Canada.
3. There is an NDEB requirement for international applicants to complete a two-year qualifying program at a Canadian or American University before they will be permitted to challenge the exam. Given that the level of academic training around the world differs from standards established in Canada (and other accredited institutions) and given that an examination cannot possibly cover each facet of that training, it is possible that an individual could successfully complete the NDEB examination without possessing the full depth and breadth of competencies which would accrue to an individual who has successfully completed the four year degree at an accredited program. In the interest of public safety therefore, it seems reasonable for the graduates of non-accredited dental programs to be required to undertake a two year program. It should be noted that this is not a requirement under the Act, but rather a requirement of the NDEB.

For a specialty certificate, there are two non-exemptible requirements per the Act.

1. The applicant must have graduated from an accredited specialty program. If the applicant has graduated from a non accredited speciality program (i.e. international programs) then they will either have to take the specialty program at an accredited University or complete a Canadian based assessment program at an accredited Canadian university. The length of these assessment programs will vary depending on the specialty. The assessment programs are in the process of being implemented and therefore no students have completed these programs as yet.
2. The applicant must pass the national exam for the specialty being sought.

As with the non-exemptible requirements of the general certificate, we believe that in consideration of public safety these requirements are fair. It should be noted that in the case of specialty certificates, an applicant who has already qualified for the specialty in their home country, may complete a Canadian based assessment program as opposed to taking the complete specialty course.

In discussions with staff of the College, it became evident that the level of training offered in various jurisdictions around the world varies greatly from the academic requirements in Canada. The academic requirements placed on foreign trained dentists (i.e. the two year university program for general certificate and the assessment programs for specialty certificates) are therefore deemed necessary and fair in the interest of public safety.

Given that actual control of establishing minimum qualifications for registration as summarized below are shared amongst all the dental regulators in the country, the faculties of dentistry, the examining bodies and the provincial governments and not just the College, we do not believe that we have the expertise to comment on these processes. We can only state that the process and requirements for dental licensure appear to be appropriate, fair and reasonable based on our observations and discussions.

The general requirements for all Certificates of Registration per the Dentistry Act, 1991 include that the applicant:

Requirement	Exemptible or Non-exemptible Requirement	Documentation College will Accept to Satisfy Requirement
<ul style="list-style-type: none"> Has not been found guilty of a criminal offence or an offence under the Narcotic Control Act (Canada) or the Food and Drugs Act (Canada) 	<ul style="list-style-type: none"> Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> Attestation of applicant in application form
<ul style="list-style-type: none"> Has not been the subject of a finding of professional misconduct, incompetence or incapacity, if registered or licensed to practice dentistry in another jurisdiction 	<ul style="list-style-type: none"> Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> Certificate of Standing by Regulatory authority in jurisdiction where applicant has practiced
<ul style="list-style-type: none"> Is not the subject of a current professional misconduct, incompetence or incapacity proceeding, if registered or licensed to practice dentistry in another jurisdiction 	<ul style="list-style-type: none"> Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> Certificate of Standing by Regulatory authority in jurisdiction where applicant has practiced
<ul style="list-style-type: none"> Holds a degree in dentistry as evidence of successful completion of a course in dental studies of at least four years duration at a university-based dental school 	<ul style="list-style-type: none"> Technically Exemptible under the act; however, NDEB requires the degree to be eligible to sit the exam. Successful completion of the exam is a non-exemptible requirement under the act. 	<ul style="list-style-type: none"> Certified copy of diploma plus an original letter from the Dean of the University certifying graduation and date
<ul style="list-style-type: none"> Is reasonably fluent in English or French 	<ul style="list-style-type: none"> Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> Attestation of applicant in application form
<ul style="list-style-type: none"> Has successfully completed a course in ethics and jurisprudence and other such examinations as set or approved by the College 	<ul style="list-style-type: none"> Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> Certificate of successful completion of course
<ul style="list-style-type: none"> Is a Canadian citizen or permanent resident of Canada or has received the appropriate authorization to engage in the practice of dentistry in Canada 	<ul style="list-style-type: none"> Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> Certified copy of Canadian passport, birth certificate, citizenship card, proof of permanent residence status or work permit

Additional requirements for the issuing of a general certificate of registration per the Act are the following:

Requirement	Exemptible or Non-exemptible Requirement	Documentation College will Accept to Satisfy Requirement
<p>1. The applicant,</p> <p>i. holds a Certificate of the National Dental Examining Board of Canada issued before January 1, 1994</p> <p>ii. has successfully completed the National Dental Examining Board of Canada examinations leading to a Certificate of the National Dental Examining Board of Canada at a time when those examinations were approved by the College, OR</p> <p>iii. satisfies the Registration Committee that he or she,</p> <p>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</p> <p>B) has successfully completed a qualifying examination to test the applicant's knowledge, judgment and clinical competence in general dentistry that was set or approved by the Registration Committee at the time the applicant took it.</p>	<ul style="list-style-type: none"> • Non-exemptible per the Dentistry Act 1991. 	<ul style="list-style-type: none"> • For (i) & (ii), a certified copy of the certificate from the NDEB
<p>2. Since the applicant satisfied the requirement of paragraph 1 above, there has been no three-year period during which the applicant has not engaged in the practice of dentistry on a continuous and regular basis in Canada or the United States of America.</p>	<ul style="list-style-type: none"> • Exemptible (on a case by case basis) 	<ul style="list-style-type: none"> • Attestation of applicant in application form & certificate of standing from previous jurisdiction practiced
<p>International applicants, must first successfully complete a two-year qualifying program at a Canadian university before they will be permitted to challenge the NDEB examinations</p>	<ul style="list-style-type: none"> • This requirement is not included in the Dentistry Act. NDEB requires the degree to be eligible to sit the exam. Successful completion of the exam is a non-exemptible requirement under the act. 	<ul style="list-style-type: none"> • Certificate or diploma from Canadian University

Requirements for the issuing of a specialty certificate of registration per the Act are the following:

Requirement	Exemptible or Non-exemptible Requirement	Documentation College will Accept to Satisfy Requirement
<p>1. The applicant has successfully completed one of the following accredited specialty programs for the Specialty for which a specialty certificate is being sought: Endodontics Oral and Maxillofacial Surgery Oral Pathology Oral Medicine Oral Radiology Orthodontics Paediatric Dentistry Periodontics Prosthodontics Public Health Dentistry Dental Anaesthesia</p> <p>Graduates of non-accredited (international) dental specialty programs must successfully complete a Canadian University based assessment program approved by the College at the time the applicant commenced it. This will provide evidence that the applicant possesses knowledge, skill and judgment at least equivalent to a current graduate of an approved diploma or degree program.</p>	<ul style="list-style-type: none"> • Non-exemptible per the Dentistry Act, 1991 	<ul style="list-style-type: none"> • Certified copy of specialty degree/certificate must be submitted plus an original letter from Dean of University certifying date of post graduate, specialty graduation • Certificate of Completion issued by Canadian University doing assessment
<p>2. The applicant has successfully completed one of the following:</p> <p>i. the National Dental Specialty Examination for the specialty for which the applicant is seeking a specialty certificate of registration, or</p> <p>ii. another specialty examination set or approved by the College for the specialty for which the applicant is seeking a specialty certificate of registration.</p>	<ul style="list-style-type: none"> • Non-exemptible per the Dentistry Act, 1991 	<ul style="list-style-type: none"> • Original letter from RCDC certifying successful completion of examination
<p>3. Since successfully completing the National Dental Specialty Examination, there has been no three-year period during which the applicant has not engaged in the practice of dentistry on a continuous and regular basis in Canada or the United States of America.</p>	<ul style="list-style-type: none"> • Exemptible 	<ul style="list-style-type: none"> • Attestation of applicant in application form & certificate of standing from previous jurisdiction practiced

With respect to third parties assessing qualifications:

The College does not arbitrarily set the examinations which must be successfully completed (non-exemptible requirement of the Dentistry Act) in order to qualify for a certificate. As above, the College accepts that it is responsible for ensuring to the best of its ability that examinations test for established competencies and do so in a fair and transparent manner. It maintains, however, that it does not have the ability to arbitrarily change the examination process. It believes that the development and validation of examinations and competency systems is a science unto its own and must be left to the experts in the field.

The College utilizes two national examiners, one for general practitioners, and one for specialists. In each case, the examination is a "non-exemptible" requirement. The National Dental Examining Board of Canada (NDEB) 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 set up by Act of Parliament in 1965 and is responsible for establishing standards for speciality areas of dentistry. Both bodies are named in Ontario's Registration Regulation and their role as examiners is recognized. Examination development is complicated and requires expertise which is why the College uses an external examining body that specializes in this field.

The College takes reasonable measures to ensure that third parties make assessments in a way that is transparent, impartial and fair by requesting both bodies to submit annual reports to the College. The College also requests both bodies to submit information on how they comply with fair registration practices. In addition, the College has representation on the NDEB which acts further as a monitoring and guidance tool. The College is also in the final stages of negotiating a contract with the RCDC. These discussions will define the relationship between RCDC and the College and have included ways of improving the RCDC's appeals process.

Both external bodies (NDEB & RCDC) are responsible for setting competencies and every year perform a review of the certification and examination procedures and make adjustments to improve the validity and reliability of examinations. In addition to these internal reviews, the NDEB has invited several external evaluations.

With respect to transparency, both examination bodies have a website and information packages that describe the examination formats, suggested topics for study, dates, fees, history, by-laws, government appointed authority and appeals process for applicants.

Training

This criteria was specifically addressed through steps 41 of the Audit Program (Appendix I).

The College ensures that persons assessing qualifications and making registration decisions are trained. There are 4 members of staff who are involved in registration applications. Training and orientation policies are provided to all registration staff where staff roles and duties are clearly laid out. The Registrar and registration manager have significant years of experience and expertise in dealing with applications, especially with respect to unusual or difficult cases that will be referred to the Registration Committee. The registration clerks are heavily trained by the Registration Manager and are responsible for opening applicant files, and receiving all required documentation for applicants. Registration clerks do not have the authority to actually approve a registration and must obtain the approval of the Registration Manager.

The Registration Committee is also well trained in that three of the four members are dentists who are elected by the membership onto Council and one member is publicly appointed by the Lieutenant Governor of Ontario. In addition, all Registration Committee members have had to undergo required orientation training before being able to make registration decisions. The members also have significant experience in assessing applications and therefore have the necessary knowledge of any special considerations that may apply.

Furthermore, the Chair of the Registration Committee and the Registrar have attended a "Managing Cultural Differences" workshop and it is planned that registration staff will also attend.

Access to records

This criteria was specifically addressed through step 6 of the Audit Program (Appendix I)

The College provides applicants access to records related to their applications as they are entitled to receive copies of everything that the Registration Committee receives when formulating a decision. This is done automatically for each applicant and without any fees being charged.

Where the College holds personal information about an individual, upon written request, the College may allow access to the information to that individual, unless providing access could reasonably be expected to interfere with the administration or enforcement of any legislation or it is impractical or impossible for the College to retrieve the information. Examples where access may be denied include:

- a) Information contains references to another individual that cannot be severed;
- b) Disclosure may result in significant risk of harm to the requestor or a third party;
- c) Information was collected or created in the course of inspection, investigation, inquiry or assessment authorized by law;
- d) The College did not create the record and it is appropriate for the individual to request access from the organization that created the record;
- e) Disclosure may defeat the purposes for which the information was collected;
- f) Information cannot be disclosed for legal, security or commercial proprietary reasons;
- g) Information is subject to solicitor- client or other privilege;
- h) Information was generated in the course of a formal dispute or resolution request;
- i) The request is frivolous, vexatious, or otherwise an abuse of process.

In the event that the College refuses to provide access to all of the personal information it holds, the College will provide reasons for denying access. The individual may then choose to file a complaint with the Registrar.



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