

# Fair Registration Practices Report

## Traditional Chinese Medicine Practitioners and Acupuncturists (2013)

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

This Fair Registration Practices Report was produced as required by:

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

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

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

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

The College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO) came into existence on April 1, 2013. Up until April 1, 2013, the practice of traditional Chinese medicine (TCM) and TCM acupuncture was not regulated in Ontario. Prior to April 1, 2013 (since 2008), in preparation for becoming the College, the Transitional Council engaged in discussions and dialogue with TCM practitioners, various stakeholders, TCM associations, media and the Office of the Fairness Commissioner to seek input and feedback on the registration requirements as well as updating the community on the activities and progress of the Transitional Council. Between 2008 and 2010, TCM practitioners and other members of the traditional Chinese medicine community were invited to numerous information sessions in London, Toronto and Ottawa to solicit input and feedback on the registration requirements as well as to help practitioners to prepare for registration. Furthermore, the Transitional Council set out the regulation development and approval process in Transitional Council's newsletter and in many information sessions, encouraging TCM practitioners and associations to visit the Transitional Council's website to locate the newsletters and other useful information to prepare for regulation of the profession.

Later, in April 2012, the Ministry advised the Transitional Council that the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO) would likely come into effect as of April 2013. The Transitional Council announced this timeframe by way of newsletters, public Council meetings, press releases, and numerous information sessions. Approximately ten months later, on February 4, 2013, the Ministry advised the Transitional Council that the Registration Regulation was filed and would come into force in early April 2013. Starting the next day on February 5, 2013, the Transitional Council sent a further memo by email to several traditional Chinese medicine professional associations, advising that it "is now ready to receive applications..." These associations were invited to attend a workshop to learn about the information and documents CTCMPAO would require as part of the application process so that they could, in turn, assist their members in preparing for registration. The Transitional Council also sent out a memo by email to everyone on CTCMPAO's contact list, reminding them to apply for registration with CTCMPAO.

Under the Registration Regulation, there are five classes of registration: Grandparented, General, Student, Temporary and Inactive. In 2013, CTCMPAO accepted applications for two of those classes, Grandparented and General. The applications for registration for the Grandparented class were made available on the Transitional Council's website on February 22, 2013. Applications for the General class were made available

six days later, on February 28, 2013.

The Transitional Council received and processed between 600 and 700 applications for registration before April 1, 2013. Approximately 500 of those applications were received between March 19th and April 1st; and, on its first day of existence, the CTCMPAO issued approximately 450 certificates of registration. As of December 2013, CTCMPAO had issued 1986 certificates of registration within an eight-month period.

### **Grandparented Class of Certificate of Registration**

The intent of the Grandparented class of certificate of registration is to permit entry to those practitioners who were practising traditional Chinese medicine in Canada before the time of proclamation, regardless of whether the practitioner went through formal education or was trained on the job by a master.

However, in order to ensure the public is protected, certain safeguards are required. These include requiring applicants to provide CTCMPAO with evidence of having completed a minimum of 2,000 traditional Chinese medicine patient visits in Canada in the five years before April 1, 2013 (the date the Registration Regulation came into force), and successfully completing CTCMPAO's Jurisprudence Course and Safety Program.

Entry to the Grandparented class of certificate of registration is time-limited, with the deadline to submit applications for the Grandparented Registration Class of certificate ending on March 31, 2014.

The steps to initiate the registration process in the Grandparented class of certificate of registration are as follows:

- Complete Jurisprudence Course
- Complete Safety Program
- Complete Application Form
- Complete 2000 patient visits in Canada, which may include traditional Chinese acupuncture patient visits, in which traditional Chinese medicine diagnoses was utilized in the five years immediately before proclamation
- Provide proof of meeting all non-exemptible requirements for registration
- Provide details on previous professional conduct
- Provide results of a criminal background check
- Ability to speak, read and write either English or French with reasonable fluency (applicants for Grandparented class of certificate of registration lacking in fluency must provide a written plan on how to communicate with patients and other healthcare professionals to ensure continuity of care)
- Applicant must not have a physical or mental condition or disorder
- Provide evidence of Professional Liability Insurance coverage
- Pay required fees
- Complete and sign declaration on application form
- Submit completed application

### **General Class of Certificate of Registration to use Provisional title(s)/designation(s)**

General class of certificate of registration is intended for applicants who may not have extensive practice experience in Canada, but have education and training in traditional Chinese medicine (TCM) that meets the entry to practice competencies required to practice in Canada. Currently, if a member has a General class of certificate of registration, he or she must indicate "(Provisional)" after their designation ("R. TCMP" or "R.Ac") because they have not completed the registration (entry-to-practice) examinations. Provisional Registration was intended to allow General class applicants to be registered and practise to ensure practitioners who have the required TCM education and were practising traditional Chinese medicine in Ontario prior to proclamation could continue to practise until the approval and implementation of Registration Examinations—the Pan-Canadian Written and Clinical Case-Study Examination.

On May 23, 2013, CTCMPAO approved the Registration Examinations-Pan-Canadian Written and Clinical

Case-Study Examination developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA), the national organization of provincial and territorial regulatory bodies that govern and monitor the practice of TCM Practitioners, Acupuncturists and/or Herbalists in Canada. In 2008, the Transitional Council joined the regulators of traditional Chinese medicine in British Columbia, Alberta, Quebec, and Newfoundland and Labrador in forming CARB-TCMPA, with the purpose of developing a plan to remove provincial barriers to registration by, among other things, setting up similar processes and sharing information. The Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations are in two parts, with the Written part of the first examination offered in October 2013 and the Clinical Case-Study part of the first examination offered in January 2014. Once a practitioner with a General Class of certificate of registration passes the examinations, the "Provisional" title will be removed. As of December 2013, CTCMPAO has registered 153 General class of certificate of registration applicants to use Provisional title(s)/designation(s).

Under our Registration Regulation, effective December 31, 2013, the General class of certificate of registration to use the Provisional title(s)/designation(s) was revoked. Starting 2014, applicants applying for General class of registration will have to complete all registration requirements, including the Registration Examinations-Pan-Canadian written and Clinical Case-Study Examinations to be eligible for registration with CTCMPAO.

The steps to initiate the registration process in the General class of certificate of registration are as follows:

- Complete a four-year full-time post-secondary traditional Chinese medicine (TCM) program or a three-year full-time TCM acupuncture program or equivalent
- Complete Supervised clinical experience (500 Hours)
- Complete Jurisprudence Course and Safety Program
- Complete Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations (Provisional title(s)/designation(s) holders complete the examinations after being registered with CTCMPAO)
- Provide details on previous professional conduct
- Provide results of a criminal background check
- Be able to speak, read and write either English or French with reasonable fluency
- Applicant must not have a physical or mental condition or disorder
- Applicants registered in another province must be in good standing and be able to provide a letter of good standing issued by the Registrar of the College in the other province (applicable to applicants applying under the *Labour Mobility Act*)
- Provide evidence of Professional Liability Insurance coverage
- Pay required fees
- Complete and sign declaration on application form
- Submit completed application

### **Information for Applicants**

CTCMPAO is currently accepting applications for the Grandparented and General classes of certificates of registration.

Individuals interested in applying for registration with CTCMPAO can find information and a registration application package on CTCMPAO's website. CTCMPAO's website [www.ctcmpao.on.ca](http://www.ctcmpao.on.ca) includes information on the Jurisprudence Course, Safety Program and Registration Examinations, documents that CTCMPAO requires as part of the application process and information as to how to submit their applications for registration. CTCMPAO's website also contains policies, events, flowcharts, *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada*, Frequently Asked Questions, Newsletters and the steps to initiate the registration process.

### **Individual Emails/Phone Calls**

CTCMPAO staff responds to phone calls/emails regarding the steps to initiate the registration process.

## **In-Person Appointments and Walk-in Customer Service**

CTCMPAO staff provides information to individuals applying or intending to apply for registration regarding the steps to initiate the registration process and if requested, also provides a printed copy of application package.

### **b) requirements for registration**

#### **Registration Requirements for any Class**

- Professional suitability
  - Complete and sign declaration on application form
  - Provide details on previous professional conduct
  - Provide results of a criminal background check
  - Applicant must not have a physical or mental condition or disorder
  - Applicants registered in another province must be in good standing and be able to provide a letter of good standing issued by the Registrar of the College in the other province (applicable to General Class of certificates of registration applicants applying under the *Labour Mobility Act*)
  - Ability to speak, read and write either English or French with reasonable fluency (Applicants for the Grandparented class of certificates of registration lacking in fluency must provide a written plan that explains how they will communicate with patients and other healthcare professionals to ensure continuity of care.)
  - Provide evidence of Professional Liability Insurance coverage
  - Attach required documents to support application

#### **Grandparented Class of Certificate of Registration**

Applicants for the Grandparented class of certificates of registration must complete the following steps to be eligible for registration:

- a. Applicants must have completed a minimum of 2,000 patient visits in Canada for which traditional Chinese medicine diagnoses was utilized, which may include traditional Chinese acupuncture patient visits, within the five-year period immediately before April 1, 2013;
- b. Applicants must have submitted the completed application to the Registrar on or before April 1, 2014;
- c. Applicants must have successfully completed the Safety Program that was set or approved by the Council or by a body that is approved by the Council for that purpose; and
- d. Applicants must have successfully completed the Jurisprudence Course set or approved by the Registration Committee. O. Reg. 27/13, s. 6 (1).

#### **General Class of Certificate of Registration**

Applicants for the General class of certificate of registration must complete the following steps to be eligible for registration:

- a. Applicants must have successfully completed a post-secondary program in traditional Chinese medicine (TCM) that,

i. [in the case of a traditional Chinese medicine program] consists of at least four years of full-time education, or education that is of equivalent duration, and

ii. [in the case of a traditional Chinese medicine acupuncture program] consists of at least three years of full-time education, or education that is of equivalent duration;

b. Applicants must have successfully completed a program of clinical experience in the profession that is structured, comprehensive, supervised and evaluated and which consists of at least 45 weeks of clinical experience, involving at least 500 hours of direct patient contact;

c. Applicants must have successfully completed the Safety Program that was set or approved by the Council or by a body that is approved by the Council for that purpose;

d. Applicants must have successfully completed the Jurisprudence Course set or approved by the Registration Committee;

e. Applicants must have successfully passed an assessment conducted by a panel of the Registration Committee, or by another body that is approved by the Council for that purpose, that demonstrates that the applicant has the necessary competency to safely practise the profession as the holder of a General certificate of registration;

f. Applicants must have successfully completed the registration examinations that are set or approved by the Council. O. Reg. 27/13, ss. 9 (1), 23 (3).

Information regarding CTCMPAO's requirements for registration is available from the following sources:

- CTCMPAO's website [www.ctcmpao.on.ca](http://www.ctcmpao.on.ca)
- CTCMPAO's application package provides information to individuals applying or intending to apply for registration regarding requirements for registration. The application package, resources for applicants and Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations application is available on CTCMPAO's website
- **Individual Emails:** CTCMPAO staff will respond to emailed inquiries regarding the requirements for registration.
- **Phone calls:** CTCMPAO staff responds to phone calls regarding the requirement for registration.
- **In-person appointments and walk-in customer service:** CTCMPAO staff provides in-person advice and a printed copy of the application package, if requested.

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

### **Registration Requirements for any Class of Certificate of Registration**

Our application form consists of a series of questions that help applicants provide the information necessary for CTCMPAO to process their application.

### **Grandparented Class of Certificate of Registration**

Grandparenting refers to an assessment process to register existing practitioners who may have a wide range of training, skills and experience in the traditional Chinese medicine (TCM) profession in Canada. Such arrangements balance the need for a standard of competence that will provide the necessary protection to the public with a philosophy that strives to be as inclusive as reasonably possible.

- To show evidence of successful completion of minimum of 2,000 patient visits in Canada for which traditional Chinese medicine diagnoses is utilized, which may include traditional Chinese acupuncture patient visits, within the five-year period immediately before April 1, 2013; **section 10** of the application

form asks applicants to identify which of 52 common disorders the applicant has diagnosed and treated. This is not an exhaustive list of all disorders. The intent is to identify if the applicant has a base level of competency consistent with the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada* (October 2009) and experience in traditional Chinese medicine and/or acupuncture. CTCMPAO developed a policy outlining the interpretation of *Traditional Chinese Medicine Patient Visits*, available on our **website**.

On the application form applicants indicate whether those visits were for traditional Chinese medicine acupuncture only or whether they were for the full range of traditional Chinese medicine. This information helps determine which title(s) and designation(s) (R.TCMP or R.Ac) the applicant receives.

- Grandparenting is an accommodation mechanism for those practising at the time of proclamation; therefore, applicants must apply for registration within one year of the registration regulation coming into force. Applicants must submit their completed applications to the Registrar on or before April 1, 2014.
- Applicants demonstrate successful completion of the Jurisprudence Course by sitting and passing (demonstrated by obtaining a mark of 60% or better) the Jurisprudence Course open-book tests offered by the Transitional Council and, later, CTCMPAO, where candidates are allowed to refer to their Jurisprudence Course Handbook and dictionary. Applicants can write the test as many times as they wish until they pass it. As of December 2013, the Jurisprudence Course test has been offered 42 times since October 2012.
- Applicants demonstrate successful completion of the Safety Program by sitting and passing (demonstrated by obtaining a mark of 70% or better) an open-book test where candidates are allowed to refer to their Safety Program Handbook and dictionary. The test was made available as of January 2013 and has been offered 37 times.
- CTCMPAO does not require applicants to take any formal language tests such as TOEFL. CTCMPAO will consider that an applicant has attained the language fluency if he/she can complete the registration application form, the Jurisprudence Course and Safety Program, and is able to understand communications coming from CTCMPAO. CTCMPAO expects members to have the ability to communicate with patients and other health professionals in English or French to the extent that he/she:
  - Understands the information provided by patients
  - Is able to give advice to patients and patients understand the advice
  - Can obtain patient consent
  - Can discuss treatment plans with patients
  - Is able to document and maintain patient records
  - Is able to respond to inquiries from patients or about patients from another healthcare professionals
  - Is able to comprehend and understand patient records sent by other healthcare professionals
  - Is able to provide speedy and accurate information about a patient during an emergency

In addition, it is important for members to be able to communicate and work collaboratively with regulated healthcare professionals, hospitals, long-term care homes, emergency responders and other stakeholders in Ontario's healthcare system.

- However, in recognition of the language challenges that some applicants for Grandparented class of certificate of registration may encounter, s. 4(2) of the Registration Regulation exempts applicants for the Grandparented class of certificate of registration from the requirement to speak, read and write English or French with reasonable fluency. Any Grandparented applicant who is not fluent in either English or French must have a written plan that will effectively deal with inter-professional collaboration and continuity of care posed by lack of fluency in either English or French.

### **General Class of Certificate of Registration (a revised application form will be available on CTCMPAO's website soon)**

General class of certificate of registration is intended for applicants who have formal education and training in traditional Chinese medicine (TCM), who may not have substantial work experience in the profession. To assess a General class of certificate of registration applicant, we review and consider what the applicant has

completed in his or her course of study and the extent of the course's equivalency to our approved entry-level competencies for TCM practice in Canada. We are not relying on credentialing as the majority of our applicants are educated in jurisdictions outside of Canada. We also take into consideration that the training of professionals in TCM maintains an emphasis on learning clinical experience from “masters” of the profession, in addition to book learning.

- To show evidence of successful completion of the traditional Chinese medicine (TCM) and/or TCM acupuncture (TCM/A) education programs, applicants are required to complete **section 8** of the application form and attach with their application form a notarized copy of completed degree, certificate or diploma in traditional Chinese medicine and/or acupuncture, or provide an original letter from their educational institution confirming successful completion of the program as well as attach an original or notarized copy of academic transcript of marks.
- To show evidence of successful completion of supervised clinical experience in the profession, applicants complete **section 9** of the application form and attach a copy of the detailed description for the clinical training/experience completed as a part of a TCM/A education program, including the number of clock hours spent in clinical training/experience and evidence of 500 hours of direct patient contact certified by the educational institution(s).
- Applicants demonstrate successful completion of the Jurisprudence Course by sitting and passing (demonstrated by obtaining a mark of 60% or better) the Jurisprudence Course open-book tests offered by the Transitional Council and, later, CTCMPAO, where candidates are allowed to refer to their Jurisprudence Course Handbook and dictionary. Applicants can write the test as many times as they wish until they pass it. The Jurisprudence Course test was offered 42 times from October 2012 to December 2013.
- Applicants demonstrate successful completion of the Safety Program by sitting and passing (demonstrated by obtaining a mark of 70% or better) an open-book test where candidates are allowed to refer to their Safety Program Handbook and dictionary. The test was made available as of January 2013 and has been offered 37 times.
- As a part of the application process, General class applicants' completed education program is assessed by CTCMPAO to identify the extent of the relevance to the Council's approved and published competencies for traditional Chinese medicine practice in Canada. Candidates will be required to submit information that details how their completed education is aligned to the competencies. Unlike approval of an education program, the assessment focuses on the cumulative competencies applicants have obtained through formal education and post-graduate and continuing education studies. This competency- based assessment process ensures a fair and objective evaluation process of both internationally-trained and Canadian-trained candidates.
- A passing result on the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations indicates that the applicant has demonstrated a minimal standard of competence. Currently, if a member holds a General class of certificate of registration (except for General class members who applied under the *Labour Mobility Act*), he or she must indicate "(Provisional)" after their designation ("R.TCMP" or "R.Ac") because they have not yet successfully completed the registration (entry-to-practice) examination. Once a Provisional member with a General class of certificate of registration passes the examinations, the "Provisional" title will be removed. Under the Registration Regulation, General class applicants must complete the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations within three attempts. There are two components to the Registration Examinations-Pan-Canadian examinations:
  1. A multiple-choice written examination
  2. A written clinical case-study examination

An applicant must successfully complete the multiple-choice Written Examination before sitting the written Clinical Case-Study Examination. Information and the application package for the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations are available on CTCMPAO's **website**.

The first part of the first examination was offered in October 2013 and the second part of the first examination was offered in January 2014.

- CTCMPOA does not require applicants to take any formal language tests such as TOEFL. CTCMPOA will consider that an applicant has attained the language fluency if he/she can complete the registration application form, the Jurisprudence Course and Safety Program, Registration Examinations-Pan-Canadian Written and Clinical Case-Study examinations, and be able to understand communications coming from CTCMPOA.

CTCMPOA expects members to have the ability to communicate with patients and other health professionals in English or French to the extent that he/she:

- Understands the information provided by patients
- Is able to give advice to patients and patients understand the advice
- Can obtain patient consent
- Can discuss treatment plan with patients
- Is able to document and maintain patient records
- Is able to respond to inquiries from patients or about patients from another healthcare professionals
- Is able to comprehend and understand patient records sent by other healthcare professionals
- Is able to provide speedy and accurate information about a patient during an emergency

In addition, it is important for members to be able to communicate and work collaboratively with regulated healthcare professionals, hospitals, long-term care homes, emergency responders and other stakeholders in Ontario's healthcare system.

When the registration package of information is provided to the applicant, they are also provided with a guideline accompanying the form that explains the steps in the registration process and the requirements for registration that are found in CTCMPOA's Registration Regulation. The registration application package is available on CTCMPOA's **website**.

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

**There are no educations or practical experience requirements that must be completed in Ontario or practice that must be supervised by a member of the profession who is registered in Ontario.**

#### **Grandparented Class of Certificate of Registration**

However, requirements to obtain a Grandparented class of certificate of registration require applicants to submit evidence of 2000 patient visits for which traditional Chinese medicine (TCM) diagnoses was utilized in Canada within the five years prior to April 1, 2013. Given that CTCMPOA was recently proclaimed in April 2013, it is important for CTCMPOA to recognize those individuals currently practising traditional Chinese medicine or traditional Chinese medicine acupuncture through a Grandparented registration process. Therefore, this certificate of registration is intended for those individuals who are currently practicing the profession in Canada. It is not appropriate to consider practice outside of Canada for this purpose as the applicant is being excused from registration examinations requirements.

Information regarding the Grandparented class of registration requirements of providing evidence for 2000 patient visits in Canada for which traditional Chinese medicine diagnoses was utilized is available in the application package available on CTCMPOA's website as well as provided to applicants via phone calls, emails, in-person and during walk-in customer service.

#### **General Class of Certificate of Registration**



General class of certificate of registration applicants are required to successfully complete a structured and evaluated program of clinical experience in the profession taking place anywhere in Canada or outside of Canada. The clinical supervised experience can be obtained either as a part of an applicant's formal education program or separately, so long as it meets the requirements. On the application form, a series of questions are asked to help applicants to submit this information; applicants are also required to attach documentation to verify the information submitted.

Applicants were provided the above information through the application package made available on CTCMPAO's **website** as well as by email, phone calls, in person appointments and walk-in customer service and, where appropriate, via letter.

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

CTCMPAO's Registration Regulation is embedded with alternative provisions.

#### f) the steps in the assessment process

Potential applicants can obtain this information by contacting CTCMPAO by telephone or email. CTCMPAO staff are also available to speak to applicants who come to CTCMPAO in person.

##### **The steps are as follows:**

##### **1. Receive application**

Envelopes are date-stamped upon arrival and given to a CTCMPAO staff member. The staff member opens the envelope and date-stamps each page of the application form and supporting documents, and then scans and saves the photograph. Each application is assigned a reference number. CTCMPAO sends an Acknowledgement of Receipt notice to the applicant by email/mail.

##### **2. Screen application**

CTCMPAO staff inputs the information contained in the application form into the CTCMPAO database and verifies that the form and accompanying documents are complete. **There are two possible outcomes to this step:**

i. If the file is screened as incomplete (e.g. waiting to complete Jurisprudence Course, Criminal Background report, Safety Program, Registration Examinations), staff prints an incomplete letter to be mailed/emailed to the applicant, advising which areas of the application need to be completed. Reminder notices via email and personal phone calls to applicants are made on a regular basis until the file is completed. Where appropriate, in-person meetings are arranged to help applicants complete the application form.

ii. If the file is screened as complete, the file is given to the Registration and Examinations Officer for an individual assessment or to the Director of Registration and Examinations for review.

##### **3. Review, Assess and Register**

Each applicant file is reviewed and assessed first by an Entry-to-Practice staff member or Registration and Examinations Officer and then the Director, Registration and Examinations. The Director of Registration and Examinations then once again reviews all applications to verify that required documents and examinations are all present and valid. If the applicant meets all the requirements for registration with CTCMPAO, the application is considered to be "Complete" and the application proceeds to the Registrar. The Registrar issues a "Member Letter", indicating that the applicant is now registered as a member of CTCMPAO. The member also receives a Certificate of Registration, a wallet-

size ID card and a receipt for fee payment.

If the applicant does not meet all the registration requirements (e.g. currency requirement), or if the Registrar has doubts that a certificate of registration should be issued, she/he will refer the application to a Panel of the Registration Committee for consideration. The applicant will be notified of the referral in writing and will have 30 days to submit additional information to the Panel. After 30 days, the Panel reviews additional documentation and if no further information is requested, the Panel then directs the Registrar to inform applicants of its decision.

Staff monitors and reviews the information for currency and accuracy on a regular basis.

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

### Required Documentations

a. Proof of Name Change/Evidence of Identity (if applicable)

An applicant's name used in practice and the name on CTCMPAO's Public Register must be the same. If the name on an applicant's documents is different from the applicant's current name, the applicant must provide proof of name change. This may include a copy of one of the following:

- Marriage Certificate or Record of Marriage
- Name Change Certificate
- Divorce Decree
- Validation of identity signed by legal counsel

b. Passport-size and quality photo

c. Confirmation of successful completion of the Jurisprudence Course

d. Confirmation of successful completion of the Safety Program

e. Written Language Plan (if a Grandparented class of certificate of registration applicant indicated that he/she is unable to speak, read or write with reasonable fluency in either English or French to offer professional services). Other applicants are not required to attach documentation to prove reasonable fluency in English or French. **Please refer to 1c.**

f. Copy of all licences or certificates of registration as a Traditional Chinese Medicine (TCM) Practitioner and/or TCM Acupuncturist

g. Professional Liability Insurance certificate

h. Report on Criminal Background Check

i. Notarized copy of degree, certificate or diploma in traditional Chinese medicine (TCM) or TCM acupuncture education program or an original letter from an educational institution confirming successful completion of the program (only applicable to General class of certificate of registration applicants)

j. Notarized copy or original of academic transcripts (only applicable to General class of certificate of registration applicants)

k. Copy of the detailed description for the clinical training/experience completed as a part of traditional

Chinese medicine (TCM) and TCM acupuncture program or internship, including the number of clock hours spent in clinical training/experience and evidence of 500 hours of direct patient contact certified by the educational institution(s) (only applicable to General class of certificate of registration applicants)

l. "In Good Standing Letter" from the TCMPPA regulatory authority in which an applicant currently holds a certificate of Traditional Chinese Medicine (TCM) Practitioner and/or TCM Acupuncturist registration (only applicable to applicants applying for General class of certificate of registration under the Labour Mobility Act)

m. Completed application form

n. Application fee and registration fee

The same information is required of domestically and internationally trained applicants.

This information is communicated in the application package available on CTCMPAO's **website**; as well, a printed copy is available at CTCMPAO.

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

CTCMPAO has received a number of applications for registration from internationally trained applicants in the General class of certificate of registration for which the required documentation of successful completion of the supervised clinical experience was unavailable. The Registration Committee therefore approved a policy to allow applicants to submit a legally-sworn affidavit as an alternative to the required documentation only if applicants cannot obtain the evidence of supervised clinical experience for reasons beyond their control. This information can be obtained by communicating with CTCMPAO staff. If an applicant requests an exemption of some kind from the documentation ordinarily required, the request will be carefully considered by the Registrar and addressed depending on the specific circumstances and evidence available to otherwise satisfy the registration requirements.

i) how applicants can contact your organization

Applicants can contact CTCMPAO through email, fax, mail, and phone or in person. The Registrar's contact information is included in the application package. Contact details are also available on CTCMPAO's **website**.

**By Mail**

163 Queen Street East, 4th Floor, Toronto, ON M5A 1S1

**Regular office hours**

Monday to Friday, from 9:00 a.m. – 5:00 p.m.

**Telephone:** 416.862.4790

**Fax:** 416.874.4078

**Toll-Free:** 1.866.624.8483

**Email:** *info@ctcmpao.on.ca*

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

CTCMPAO staff communicates with applicants via phone, email, mail or in-person meeting. The application package outlines the expected application timelines and process. The guideline accompanied with the application form is posted on CTCMPAO's **website**; copies of the application package can also be obtained in print by contacting CTCMPAO or arranging a personal meeting. CTCMPAO staff monitors and reviews the information for currency and accuracy on a regular basis.

CTCMPAO staff communicates with applicants throughout the registration process, beginning with a confirmation email when an application form is received. Following successful completion of the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations, Jurisprudence Course and Safety Program, CTCMPAO communicates by mail/email with applicants to advise them of their results.

After reviewing an application, staff will notify the applicant if any documents are missing or when the application is approved. Once registered, an email confirmation is sent to the member. This is followed up with a new member package, including a letter from the Registrar, certificate of registration, wallet-sized ID card and practitioner handbook. Throughout the application process staff are available to answer questions from applicants. The nature and frequency of communication is applicant-specific and depends on how often an individual contacts CTCMPAO while moving through the registration process.

If an application is referred to the Registration Committee, staff will communicate with an applicant via phone, email and/or mail as needed.

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

To date, CTCMPAO has not faced a situation in which documentation has been submitted in a language other than English or French. Should such a situation arise, the applicant will be notified that all documents must be translated into the English or French language. An applicant can find out this information through communication with CTCMPAO staff. Additional information regarding the process of translation of documentation will be posted on CTCMPAO's website in the future.

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

CTCMPAO recruits its third parties through a comprehensive and rigorous selection process to ensure third parties are able to provide quality services and ensure public safety. CTCMPAO maintains a contractual agreement with all of its third parties to ensure third parties are assessing applicants in a transparent, objective, impartial and fair way. Third parties are also required to provide reports to CTCMPAO to ensure a timely exchange of information and to maintain an open and cooperative working relationship in order to ensure a successful delivery of all assessments.

#### **Safety Program Test**

The Safety Program Test was administered and scored on behalf of CTCMPAO by a third party, Curriculum Services Canada (CSC), from January 2013 until June 2013. However, CTCMPAO made all decisions respecting the results of each applicant's completion of the Safety Program. As of July 2013, CTCMPAO administered the Safety Program Test as the third party did not wish to continue to offer the test. Curriculum Services Canada was responsible for confirming enrollment and providing timely responses to applicants'

inquiries on their applications regarding the logistics and processes for taking the Safety Program Test. CSC sent results of each applicant's assessment to CTCMPAO to advise applicants.

The third party's application form and candidates' instruction guide regarding the Safety Program Test was linked to CTCMPAO's website.

Applicants may also communicate with CTCMPAO staff to learn more about the Safety Program Test registration process.

## **Registration Examination-Pan-Canadian Written and Clinical Case-Study**

### **Examinations**

CTCMPAO's Council approved the Registration Examinations—the Pan-Canadian Written and Clinical Case-Study Examinations developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA). There are two components to the Pan-Canadian examinations:

1. A multiple-choice written examination
2. A written clinical case-study examination

CARB-TCMPA is the national organization of provincial and territorial regulatory bodies that govern and monitor the practice of Traditional Chinese Medicine (TCM) Practitioners, TCM Acupuncturists and/or TCM Herbalists. In 2008, the Transitional Council joined the regulators of traditional Chinese medicine in British Columbia, Alberta, Quebec, and Newfoundland and Labrador in forming CARB-TCMPA with the purpose of developing a plan to remove provincial barriers to registration by, among other things, setting up similar processes and sharing information.

The Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations will use the same standards and processes to ensure safe, effective and ethical practice to evaluate both internationally-trained candidates and Canadian-trained candidates. These national examinations are also meant to ensure quality standards and facilitate labour mobility across provinces. To ensure a fair and transparent assessment process, CARB-TCMPA, representing all five TCM regulatory bodies across Canada, contracted an examinations administration consulting firm to administer and score the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations on behalf of each province.

However, each provincial regulatory body, including CTCMPAO, makes all decision respecting the result of each applicant's assessment of successful completion of the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations.

### **CARB-TCMPA is responsible for:**

- Developing the Pan-Canadian Written and Clinical Case-Study Examinations based on the occupational competencies that entry-level TCM Practitioners, TCM Acupuncturists and/or TCM Herbalists must have to practise safely, effectively and ethically, in consultation with all members of CARB-TCMPA, which includes TCM experts from all five provinces.
- Developing the Blueprint document to describe the Registration Examinations-the Pan-Canadian Written and Clinical Case-Study Examinations in consultation with all members of CARB-TCMPA to facilitate the development of reliable and valid examinations to assess applicants fairly, in a consistent and transparent manner.
- Developing new examination questions and revising and analyzing performance of existing examination questions and subsequently updating the item bank to ensure a robust item bank
- Determining the passing score in consultation with all members of CARB-TCMPA

**The CARB-TCMPA-selected examinations administration consulting firm is responsible for:**

- Marking answer sheets and confirming scores;
- Sending results of each applicant's assessment to CTCMPAO; and
- Providing a transparent, objective, impartial and fair process, including addressing candidates' concerns, such as requests for re-scoring, if warranted.

Information regarding the Registration Examinations-the Pan-Canadian Written and Clinical Case-Study Examinations, including the application package, a flow chart explaining the process of registration, Candidates' Examination Guide and Blueprint for Examinations are linked to CTCMPAO's website. Applicants may also communicate with CTCMPAO staff to learn about the examination registration process.

### **Individual emails**

CTCMPAO staff responds to emailed queries regarding the role of third parties of which the applicant may come into contact with during the registration process.

### **Phone Calls**

CTCMPAO staff responds to phone calls regarding the role of third parties of which the applicant may come into contact with during the registration process.

### **In-Person Appointments and Walk-in Customer Service**

CTCMPAO staff provides information to individuals applying or intending to apply for registration regarding the role of third parties of which the applicant may come into contact with during the registration process.

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

### **Grandparented Class of Certificate of Registration**

To be eligible for the Grandparented class of certificate of registration, Grandparented class of certificate of registration applicants are required to submit completed applications within one year from the time of the proclamation: April 1, 2014. The Grandparented class of certificate of registration is a time- limited accommodation mechanism for those practicing at the time of proclamation.

### **General Class of Certificate of Registration**

Currently, if a member has a General class of certificate of registration (except for applicants applying under the *Labour Mobility Act*), he or she must indicate "(Provisional)" after their designation ("R.TCMP" or "R.Ac") because they have not completed the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations. Provisional status allows CTCMPAO to begin registering members while Registration Examinations components to support the General class of certificate of registration are being developed and approved by Council. The Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations are in two parts, with the Written part of the first examination offered in October 2013 and the Clinical Case-Study part of the first examination offered in January 2014. Once a practitioner with a General class of certificate of registration passes the examination, the "Provisional" element of the title will be removed.

In May 2013, Council approved the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA). Under our Registration Regulation, effective December 31, 2013, the General class of certificate of registration to use the Provisional title(s)/designation(s) was revoked. As of January 1, 2014, General class applicants must meet all registration requirements including completing the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations to be eligible to register with CTCMPAO.

Under the Registration Regulation, General class of certificate of registration applicants must complete the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations within three attempts. There are two components to the Registration Examinations-Pan-Canadian Written and Clinical Case- Study Examinations:

1. A multiple-choice written examination
2. A written clinical case study examination

An applicant must successfully complete the multiple-choice Written Examination before sitting the written Clinical Case Study Examination.

Applicants who fail the examination three times are not eligible to repeat the examination unless the candidate completes the further education or training or combination of education and training required by a Panel of the Registration Committee.

### **Jurisprudence Course and Safety Program**

Under the Registration Regulation, applicants must complete the Jurisprudence Course and Safety Program within a three-year period immediately before the date of an applicant's application or at some point following the submission of his or her application.

### **Application Form**

Applicants must follow up on missing/incomplete/inaccurate information within a year from the time the application form was signed, as the form expires after twelve months.

The above information is communicated to applicants through the application package available on CTCMPAO's website.

### **Criminal Background Report**

Under the provisions of the Registration Regulation, applicants are required to submit a Criminal Background Check Report using the database of the Canadian Police Information Centre (CPIC) operated by the RCMP with their application form. For registration purposes, CTCMPAO only requires a name-based criminal background check report. The search must have been conducted no more than six (6) months before the date of application, including records of discharges which have not been removed from the CPIC system in accordance with the Criminal Records Act and records of outstanding criminal charges of which the police are aware.

Information can be obtained from CTCMPAO's website.

### **Photograph**

Applicants are required to submit a passport-size and quality photograph taken within 12 months of submitting the application. The photograph is requested for wallet-sized ID purposes. This information is communicated to applicants through our application form.

Individuals interested in applying for registration with CTCMPAO can find the information and registration application package and Registration Examinations-Pan-Canadian Written and Clinical-Case Study Examinations application on CTCMPAO's website, as well as documents required as part of the application process and information as to allow to submit their applications for registration. CTCMPAO's website also

contains policies, resources and flowcharts.

### **Individual Emails/Phone Calls**

CTCMPAO staff responds to phone calls and emails regarding the deadlines or time limits that applicants are subject to during the registration process.

### **In-Person Appointments and Walk-in Customer Service**

CTCMPAO staff provides information to individuals applying or intending to apply for registration regarding the deadlines or time limits that applicants are subject to during the registration process.

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

### **Grandparented Class and General Class Application**

**Timeline:** A complete (all required documentation) application processing time: three to eight weeks

**Notes:** CTCMPAO received an overwhelming response in applications. Given the tight proclamation timeline, limited resources and lack of infrastructure and even mindful of the importance to register qualified practitioners to ensure public safety notwithstanding, 70% of the applications received were processed within this timeline.

### **Jurisprudence Course Test**

**Timeline:** Six weeks

**Notes:** Six weeks includes applicants' preparation time, applications processing time and the successful completion of the assessment.

### **Safety Program Test**

**Timeline:** Six weeks

**Notes:** Six weeks includes applicants' preparation time, applications processing time and the successful completion of the assessment.

### **Criminal Background Report**

**Timeline:** One week

**Notes:** Timeline may vary for applicants to obtain the report



## **Professional Liability Insurance**

**Timeline:** Three to five business days

**Notes:** Timeline varies depending on applicants ability to obtain information and coverage

## **Supporting Documentations**

**Timeline:** One to three weeks

**Notes:** Timeline varies depending on applicants' ability to obtain information and documents

## **Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations:**

**Timeline:** One year or more

**Notes:** Timeline varies for each applicant

## **Complete application form and sign declaration**

**Timeline:** One to three weeks

**Notes:** Timeline varies depending on applicants' ability to obtain information and documents

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

The fees structure is explained in CTCMPAO's by-law. The fees charged by CTCMPAO are well within range of comparably-sized health regulatory bodies in Ontario. The following fees schedule was determined based on the 2010 operational budget of the Transitional Council.

### **Fees (HST is added to all fees)**

I. The application fee is \$150 (non-refundable).

II. The registration fee and the annual renewal fee for a Grandparented class of certificate of

registration for either category is \$850.

III. The registration fee and the annual renewal fee for a General class of certificate of registration for either category is \$850.

IV. The registration fee and the annual renewal fee for a General class of certificate of registration to use the Provisional title(s)/designation(s) for either category is \$850.

V. The registration fee and the annual renewal fee for a Student class of certificate of registration for either category is \$50 (no application fee).

VI. The registration fee and the annual renewal fee for an Inactive class of certificate of registration for either category is \$280.

VII. The registration fee for a Temporary class of certificate of registration for either category is \$850.

VIII. The fee for Jurisprudence Examination/Assessment is \$100.

IX. The fee for Safety Examination/Assessment is \$100.

X. 2013 Pan-Canadian Acupuncturists Examinations Fees

i. Acupuncture Examinations Application Fee \$226.00 (\$200.00+\$26.00 HST)

ii. Acupuncture Written Examination Fee \$452.00 (\$400.00+\$52.00 HST)

iii. Acupuncture Clinical Case Study Examination Fee \$339.00 (\$300.00+\$39.00 HST)

XI. 2013 Pan-Canadian Traditional Chinese Medicine Practitioners Examinations Fees

i. TCMP Examinations Application Fee \$226.00 (\$200.00+\$26.00 HST)

ii. TCMP Written Examination Fee \$565.00 (\$500.00+\$65.00 HST)

iii. TCMP Clinical Case-Study Examination Fee \$565.00 (\$500.00+\$65.00 HST)

XII. Re-score Fee \$226.00 (\$200.00+\$26.00 HST) per examination

The applicable By-law is posted on CTCMPAO's website. The fee structure is also explained in the application package the applicant receives. At every step thereafter, the fees are again outlined in the written communication with the applicant, as well as over the phone, by email, and/or in-person.

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

CTCMPAO accommodates individuals with special needs on a case-by-case basis, which is communicated through CTCMPAO staff and the application package.

#### **Jurisprudence Course**

CTCMPAO accommodates individuals with various disabilities, including learning disabilities, for example by providing more time to complete the Jurisprudence Course Test or by allowing the candidate to complete the course in a separate examination area.

To help internationally-trained applicants and to accommodate language needs, CTCMPAO recruited invigilators for the test who were fluent in English and either Mandarin or Cantonese. CTCMPAO advised Grandparented applicants on our website that if anyone requested the assistance of a translator, CTCMPAO would dedicate test dates for certain languages and would provide a translator at the test. CTCMPAO also emailed applicants who had failed the test due to a lack in English language proficiency and communicated that they could re-write the test with the assistance of a translator. Recently, the Registration Committee revised the policy to allow applicants to bring their own interpreters to the test.

## **Safety Program**

The Safety Program Test offered by a third party, as well as CTCMPAO, accommodates those with health or physical challenges and gives more time for those who need it or allows the candidate to complete the course in a separate examination area.

Despite the high pass rate of the Safety Program Test, CTCMPAO took further steps to accommodate language needs. In May 2013, Council approved a "Safety Test Accommodation Plan" and posted this information on CTCMPAO's website along with an application form. CTCMPAO also advises Grandparented applicants who failed the Safety Program Test via email and phone calls that, if they declared that they could not speak, read or writes English or French with reasonable fluency, CTCMPAO will permit them to write the test again at home with the assistance of a translator retained by the applicant. CTCMPAO deems all applicants who take the Safety Program Test at home with the assistance of a translator to have successfully completed review of the Safety Program Handbook content if they are able to satisfactorily respond to a series of questions that CTCMPAO provides. The questions require applicants to, among other requirements, explain how they will apply safety standards in their own practice. Although no "pass or fail" is given, practitioners who cannot demonstrate that they understand the safety requirements are asked to resubmit their responses.

## **Registration Examination-Pan-Canadian Written and Clinical Case-Study Examinations**

CTCMPAO's third party administrator of the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations accommodates various disabilities that could adversely affect an applicant's performance on an examination and requires the applicant to complete a Testing Accommodation Candidate Application Form. This form must be completed and received by CTCMPAO within a certain deadline and accommodations cannot be provided for requests received after the deadline.

Candidates who are requesting an Accommodation for Special Needs are required to submit to CTCMPAO to the attention of the Registrar a formal diagnosis from a qualified healthcare professional that is registered in a professional health regulatory body in Ontario. The formal diagnosis must describe the disability.

The above information is made available on CTCMPAO's website.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

## Amount of Fees (2 / 13)

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

There is no difference in fees for internationally trained applicants.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

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

a) What are your timelines for making registration decisions?

Once an application meets all the registration requirements and all of the documents (criminal report and declaration, etc.) have been submitted, the file is considered complete and applicants are issued a certificate of registration and provided with written confirmation of their registration via email within three to eight weeks of CTCMPAO's receipt of a complete registration application. 70% of the applications received were processed within the above timeline.

An applicant will also be informed if her or his documents are sent to the Panel of the Registration Committee for review. When an application is referred to a Panel of the Registration Committee for review, the timeline for making the registration decision is generally two to six months. Panel decisions are sent to the applicant in writing via registered mail within two to four weeks of a Panel of the Registration Committee meeting date.

CTCMPAO notifies applicants about the next available examinations. Once applicants have completed their Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations, Jurisprudence Course and Safety Program, CTCMPAO forwards results, and in case of Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations, subject area mark breakdown, within two to three weeks.

The amount of time the registration process takes depends to a great extent on the time the applicant needs to gather and submit his or her documents. If an application is missing any information, a deficiency notice is sent to the applicant and in some cases, CTCMPAO staff makes in-person appointments to help applicants complete their applications.

When an application is referred to a Panel of the Registration Committee for review, the registration decision may take several months to be processed, as the Panel of the Registration Committee usually meets once in every six weeks; the complexity of the application being reviewed by the Panel of the Registration Committee is also a factor. From April until December 2013, the Registration Committee Panel met nine times to deliberate on 45 applications.

The Transitional Council received and processed between 600 and 700 applications for registration before April 1, 2013. Approximately 500 of those applications were received between March 19, 2013 and April 1, 2013 and on its first day of existence, CTCMPAO issued approximately 450 certificates of registration. As of December 31, 2013, CTCMPAO had successfully registered 1986 applicants over an eight-month period.

The application package is available on CTCMPAO's website, as well as at CTCMPAO, provides a general explanation and we directly deal with the specifics of a person's case by using examples of what CTCMPAO has determined in the past based on review of applications.

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

Every effort is made to respond to written requests for information within five to seven business days. Upon receipt of an application, CTCMPAO staff responds to the applicant with a letter of acknowledgement, and within two to six weeks of receiving an application, CTCMPAO notifies the applicant of any errors or omissions in their package. Where an application meets all the registration requirements, applicants are provided with written confirmation of their registration via email within three to eight weeks of CTCMPAO's receipt of a complete registration package. An applicant will also be informed if her or his documents are sent to the Panel of the Registration Committee for review. Registration Committee Panel decisions are sent to applicants in writing via registered mail within two to four weeks of a Panel of the Registration Committee meeting date.

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

Registration decisions are organized around the Registration Committee meeting schedule. The Registration Committee typically meets every six weeks, although a teleconference may be held in the interim should it be necessary to deal with an urgent matter. CTCMPAO provides written reasons to applicants regarding registration decisions within two to four weeks of a Registration Committee Panel meeting date.

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

All applications are date-stamped to record the received date and applications are processed and reviewed in the order they are received.

CTCMPAO ensures that it adheres to these timelines by holding regular Registration Committee meetings and by informing Committee members of time-sensitive issues as soon as possible. Timelines are tracked using a logbook, which tracks the timeline for providing written decisions by CTCMPAO's Panel of the Registration Committee.

During the proclamation period, CTCMPAO staff worked overtime, including statutory holidays, to process applications received before April 1, 2013, to ensure applicants could be granted registration upon proclamation. In addition, an additional six to eight support staff were employed on a casual basis for a period of time to assist CTCMPAO staff with the registration process.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

### Access to Records (4 / 13)

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

CTCMPAO has not received any such requests from applicants to access their own records as applicants have provided most of the documents that appear in their file. The applicant is also informed of the documentation reviewed by the Panel of the Registration Committee and if registration is refused, applicant will receive a copy of the reasons and decisions issued by the Panel of the Registration Committee.

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

Please refer to the above.

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

There are no established fees for 2013.

d) List the fees for making records available.

There are no established fees for 2013.

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

There are no established fees for 2013.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

## Resources for Applicants (5 / 13)

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

CTCMPAO has detailed information regarding the registration process, including our Jurisprudence Course and Safety Program and resources to prepare for the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations, on our website:

- a. Application guideline and form
- b. Registration Policies
- c. Jurisprudence Program Handbook
- d. Safety Program Handbook
- e. Pan-Canadian Examination Application Form
  - i. CARB-TCMPA Candidate Examination Guide Candidate Guidebook
  - ii. CTCMPAO Examination Policies
  - iii. Registration Regulation
  - iv. Blueprint for the Pan-Canadian Written Examination for TCM Practitioners and Acupuncturists
  - v. Blueprint for the Pan-Canadian Clinical Examination for TCM Practitioners and Acupuncturists
  - vi. Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (May 2010)
- f. Frequently Asked Questions
- g. Standards of Professional Practice
- h. Flow charts
- i. Resources and Publications

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

CTCMPAO's website is the main source of information for applicants. Potential applicants are first guided to the appropriate section of the website where they can access registration application form, including the checklist that applies to applicants. This information is available on the *Registration Application Forms* section

of the website, in the *For Practitioners* section. The Registration Examinations-Pan Canadian Written and Clinical Case-Study Examinations Preparation guide is available on the Pan-Canadian Written and Clinical Case-Study Examinations section in the same *For Practitioners* section. Registration Policies are available on the Policies sections of the website under the same *For Practitioners* section.

The Jurisprudence Handbook and Safety Program Handbook are available on the website, and are provided to applicants in hard copy upon request.

Any written correspondence provided to applicants advises them about the appropriate CTCMPAO staff person to contact if they require further assistance.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

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

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

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

The Office of the Fairness Commissioner (OFC) has advised CTCMPAO that they consider any referral to the Panel of the Registration Committee to be an “internal review”. CTCMPAO is responsible for administering the registration function of CTCMPAO in a manner consistent with the *Regulated Health Professions Act, 1991 (RHPA)*. If there is a question about an applicant’s suitability for registration, the Registrar refers the application to a Panel of the Registration Committee, the applicant is notified of the grounds for the referral and the applicant is given 30 days to make submissions. After reviewing applicants’ submissions, the Panel of the Registration Committee may request more information/clarification from an applicant, which may further delay the decision-making process.

The Registration Committee/Panel generally meets once every six weeks or as needed to review referrals of the applications. Once a decision is made, the decision, reasons and next steps are immediately communicated to the applicant. If an applicant’s registration is denied, the cover letters for decision and reasons for decision provide applicants with instructions about filing an appeal with the Health Professions Appeal and Review Board (HPARB). Appeals of CTCMPAO Registration Committee Panel decisions are heard by HPARB, which is solely responsible for its own timeline.

CTCMPAO is responsible for making decisions regarding applicants’ successful completion of the Jurisprudence Course, Safety Program and Registration Examinations-Pan-Canadian Written and Clinical-Case Study Examinations. CTCMPAO also confirms and informs applicants of their results of the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examination reviewed/re-scored by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and



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

There were 21 files for which the internal reviews of registration decisions exceeded timelines.

As mentioned earlier, the amount of time the registration process takes depends to a great extent on the time the applicant needs to gather and submit his or her documents.

When an application is referred to a Panel of the Registration Committee for review, the registration decision may take several months to be processed, as the Panel of the Registration Committee usually meets once in every six weeks; the complexity of the application being reviewed by the Panel of the Registration Committee is also a factor. From April until December 2013, the Registration Committee Panel met nine times to deliberate on 45 applications.

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

There were no internal reviews or appeals from internationally-trained applicants that exceeded timelines.

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

Given that the definition of an "internal review" is a file that is referred to a Panel of the Registration Committee, the submissions regarding the "internal reviews" are the documents in the initial application. Once an application is referred to a Panel of the Registration Committee, applicants are advised by a letter of their right to submit any additional documentation within 30 days; sometimes the 30-day waiting period may be waived if an applicant provides written confirmation that they wish to be referred to the Panel of the Registration Committee sooner.

***Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations***

Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations applicants can request to have their examination results reviewed/re-scored by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA) appointed examinations consulting firm, by submitting a signed and dated written request to CTCMPO, to the attention of the Registrar, within 40 days of the date of the examination. Examination answer sheets are carefully scored according to psychometric best practices. All results and decisions made by CTCMPO on re-scoring of an examination are final.

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

CTCMPO staffs inform applicants via email and mail regarding their opportunity to make submissions, which is generally in writing.

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

CTCMPAO has not received any such requests for internal review or appeal of the same registration decision.

Registration decisions are made by either the Registrar, or if Registrar is in doubt, by a Panel of the Registration Committee. Panel members declare any conflicts of interest they may have before proceeding with a review. CTCMPAO staff may provide the Panel of the Registration Committee with information regarding the application upon request; however, the decision is made by the Panel members exclusively.

e) Describe your internal review or appeal process.

CTCMPAO staff reviews all applications for the appropriate information and requirements. If there is a question whether an application meets the requirements for registration, CTCMPAO staff refers the application to the Registrar for review and subsequently to a Panel of the Registration Committee for review.

A Panel of the Registration Committee reviews these applications for the appropriate information and requirements. The Panel may allow the application, deny the application, allow the application subject to certain terms, conditions and limitations or request further information. The Panel of the Registration Committee evaluates each application in accordance with CTCMPAO regulation and policies with regard to registration.

Once a decision of the Panel of the Registration Committee is made, an applicant may appeal this decision to the Health Professions Appeal and Review Board (HPARB).

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

The Registration Committee is composed of three professional members and two public members. All three professional members have received international training.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

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

Every letter stating a refusal decision of a Panel of the Registration Committee includes applicants' right of appeal to the Health Professions Appeal and Review Board (HPARB), contact information and the applicable timelines to make an appeal.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

## Assessment of Qualifications (8 / 13)

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

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

### Grandparented Class of Certificate of Registration

- Substantial work experience in connection to the practice of the traditional Chinese medicine (TCM) profession in Canada to ensure that the level of experience of applicants and the currency of his/her knowledge, skill and judgment meets the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (October 2009)* required to practice the profession in Canada.
- Ability to speak, read and write either English or French with reasonable fluency to ensure effective communication within the healthcare system. CTCMPAO does not require applicants to take any formal language tests such as TOEFL. CTCMPAO will consider that an applicant has attained the language fluency if he/she can complete the registration application form, the Jurisprudence Course and Safety Program and be able to understand communications coming from CTCMPAO.
- Applicants for Grandparented class lacking in fluency in English may provide a written plan on how to communicate with patients and other healthcare professionals to ensure continuity of care (e.g. in case of an emergency, to share information with other healthcare providers for the patient).
- Successful completion of the Safety Program to ensure public safety.
- Successful completion of the Jurisprudence Course to ensure applicants have the knowledge in the context of practice within Ontario's healthcare system including the legislative framework, regulatory requirements, etc.

### General Class of Certificate of Registration

- Successful completion of a full-time post-secondary program in traditional Chinese medicine or traditional Chinese medicine acupuncture to ensure applicants have acquired a breadth and depth of

knowledge, skill and judgement from a formal, comprehensive and focused education program. Our Registration Regulation defines full-time education as a program of study that annually consists of at least 480 hours of classroom theoretical instruction or at least 620 hours of practical instruction or some combination of the two where, for every hours of classroom theoretical instruction that is less than 480 hours there must be a corresponding increase of 1.3 hours in the number of hours of practical instruction.

- Successful completion of clinical experience in the profession at least 45 weeks of clinical experience involving 500 hours of direct patient contact to ensure applicants are able to consolidate academic learning and able to develop skill and judgement under supervision and evaluation. Clinical experience can be obtained either as a part of an applicant's formal education program or separately, so long as it meets the requirements.
- Successful completion of the Safety Program to ensure public safety.
- Successful completion of the Jurisprudence Course to ensure applicants have the knowledge in the context of practice within Ontario's healthcare system, including the legislative framework, regulatory requirements, etc.
- Successful completion of the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations to assess applicants' entry-to-practice competencies.
- Ability to speak, read and write either English or French with reasonable fluency to ensure effective communication within the healthcare system. CTCMPAO does not require applicants to take any formal language tests such as TOEFL. CTCMPAO will consider that an applicant has attained the language fluency if he/she can complete the registration application form, the Jurisprudence Course and Safety Program, Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations and be able to understand communications coming from CTCMPAO.

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

There is no difference in the methodology used to determine whether a program completed outside or inside of Canada satisfies the requirements for registration.

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

### **Grandparented Class of Certificate of Registration**

The intent of the Grandparented class of certificate of registration is to permit those practitioners who were practising traditional Chinese medicine in Canada at the time of proclamation. The certificate of Grandparented class of registration requires applicants to have practised the profession in Canada for at least 2,000 patient visits, which may include traditional Chinese medicine acupuncture patient visits, in which traditional Chinese medicine diagnoses was utilized in the five years prior to the date the Registration Regulation came into force, which was April 1, 2013. This allows applicants to demonstrate their level of experience and the currency of their knowledge, skills and judgement.

The application form asks applicants to identify which of 52 common disorders they have diagnosed and treated. This is not an exhaustive list of all disorders. The intent is to identify if applicants have a base level of competency consistent with the Entry-Level Occupation Competencies for the Practice of Traditional Chinese Medicine in Canada (October 2009) and experience in traditional Chinese medicine and/or traditional Chinese medicine Acupuncture.

CTCMPAO developed a policy outlining the interpretation of Traditional Chinese Medicine Patient Visits, available on our website.

On the application form applicants indicate whether those visits were for traditional Chinese medicine

acupuncture only or whether they were for the full range of traditional Chinese medicine. This information will help determine which title(s) and designation(s) (R.TCMP or R.Ac) the applicant will receive.

## General Class of Certificate of Registration

### Currency Requirement

If a General class of certificate of registration applicant does not complete the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations or the required education program either one year immediately before the date the application was submitted to CTCMPAO or at some point following the submission, the applicant must have practised the profession, involving 500 traditional Chinese medicine patient visits within the three-year period that begins before the date of his/her application. CTCMPAO needs to ensure that its members have up-to-date competencies in the profession. An applicant is considered as having current knowledge, skill and judgement if he or she either completed an education program or the registration examinations no more than 12 months prior to his/her application or was in active practice in the past three years.

Similar to the Grandparented class of certificate of registration application form, the General class of certificate of registration's application form asks applicants to identify which of 52 common disorders the applicant has diagnosed and treated. This is not an exhaustive list of all disorders. The intent is to identify if the applicant has a base level of competency consistent with the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (May 2010)* and experience in traditional Chinese medicine and/or traditional Chinese medicine acupuncture.

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

This question does not apply to our context. There is no difference in the assessment process for education completed at a national or an international institution as our Registration Regulation does not have any requirements for Canadian credentials.

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

Currently, Ontario does not have any government accredited or certified traditional Chinese medicine (TCM) education program. The current private school programs vary in content and intensity. Therefore, CTCMPAO adopted the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (May 2010)* developed by CARB-TCMPA, as the minimum entry standards.

As a part of the application process, each General class of certificate of registration applicants' completed education program will be assessed by CTCMPAO to identify the extent of the relevance to the Council's approved and published competencies for traditional Chinese medicine practice in Canada. Unlike approval of an education program, the assessment focuses on the cumulative competencies applicants have obtained through their formal education and post-graduate and continuing education studies.

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

The status of an institution does not affect recognition of the credentials of applicants, as the assessment

focuses on the cumulative **competencies** applicants have obtained through their formal education completed at any institution.

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

Please refer to answer 1.p).

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

Please refer to answer 3 above.

The length of time required to complete the registration process is largely dependent on the applicant. It may take applicants two to three months to complete all required exams and become eligible for registration. The application process can take three to eight weeks once an applicant has become eligible for registration and has submitted all supporting documentations.

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

The time is the same for domestic and internationally trained applicants.

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

There is no difference in average time for nationally and internationally trained individuals.

i) If your organization conducts credential assessments:

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

To be eligible for the **General** class of certificate of registration, an applicant must complete a post-secondary program in traditional Chinese medicine (TCM) consisting of at least four years of full-time education or education that is of equivalent duration, and in the case of a traditional Chinese medicine acupuncture program, consists of at least three years of full-time education, or education that is of equivalent duration.

Currently, Ontario does not have any government-accredited or certified TCM education program. The current private school programs vary in content and intensity. The curriculum generally does not offer programs in safety, communication, and jurisprudence. Thus, we have adopted the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (May 2010)* developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA), as the minimum entry standards.

As a part of the application process, each General class of certificate of registration applicants' completed education program/learning will be assessed by CTCMPAO to identify the extent of the relevance to the Council's approved and published competencies for traditional Chinese medicine practice in Canada. Unlike approval of an education program, the assessment focuses on the cumulative competencies applicants have obtained through their formal education and post-graduate and continuing education studies.

Our Registration Regulation further defines the full-time education program as a program that annually consists of:

- At least 480 hours per year of classroom theoretical instruction; or
- At least 620 hours per year of practical instruction; or
- Some combination of the two where, for every hour of classroom theoretical instruction that is less than 480 hours, there must be a corresponding increase of 1.3 hours in the number of hours of practical instruction.

There are three components to the assessment of whether an applicant's completed educational program/learning meets the requirements of the regulation:

1. Does the applicants completed program have the minimum hours of theoretical/practical instruction?
2. Does the applicant's completed program teach traditional Chinese medicine (either full traditional Chinese medicine or traditional Chinese medicine Acupuncture)?
3. Does the academic program require the applicant to learn and demonstrate the competencies identified in the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (May 2010)*?

Applicants must demonstrate through verifiable evidence (e.g., academic transcripts, certificate) how their completed formal education and learning meets the required entry-level competencies. Applicants' verifiable evidence must clearly demonstrate:

1. Name of the program
2. Length of the program
3. Whether it is a full-time program as prescribed in our Registration Regulation
4. Whether the program content meets entry-to-practice competencies
5. Whether course titles have relevance to required competencies

CTCMPAO will soon be developing a guideline explaining as to what the Registration Committee will be looking for in order to determine if an applicant's completed educational program and learning meets the entry-level competencies.

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

Please see the above answer.

iii. Explain how work experience is taken into account.

Work experience is taken in to account for the Grandparented class of certificate of registration. Please see answer 1c.

j) If your organization conducts competency assessment:

i. Describe the methodology used to evaluate competency.

CTCMPAO does not conduct competency assessments.

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

CTCMPAO does not conduct competency assessments.

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

CTCMPAO does not conduct competency assessments.

k) If your organization conducts prior learning assessment:

i. Describe the methodology used to evaluate prior learning.

CTCMPAO does not conduct Prior Learning Assessments for applicants.

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

CTCMPAO does not conduct Prior Learning Assessments for applicants.

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

CTCMPAO does not conduct Prior Learning Assessments for applicants.

l) If your organization administers examinations:

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

### **Jurisprudence Course Test**

#### **Format**

The Jurisprudence Course is an open-book multiple-choice test with 30 questions. All candidates are allowed up to 90 minutes to complete the test. Candidates are allowed to refer to dictionaries and their Jurisprudence Course Handbook published by CTCMPAO when answering questions. There are no questions that require candidates to create a written response or provide an oral response.

#### **Scoring**

Practitioners demonstrate successful completion of the Jurisprudence Course by sitting and passing



(demonstrated by obtaining a mark of 60% or better) the Jurisprudence Course open-book tests. All questions are weighted equally. Candidates are expected to select the best or most suitable answer from the choices available, based solely on the content that is provided in the Jurisprudence Course Handbook. All questions are scored as either correct (1 mark) or incorrect (0 marks).

Candidates will not be advised of their score on the test. All tests that have scores below 60% will be re-scored to verify results. After scores have been verified, the candidate may not appeal the decision. Practitioners can write the test as many times as they wish until they pass it.

### **Safety Program Test Format**

The Safety Program Test is an open-book multiple-choice test with 40 questions. All candidates are allowed up to 120 minutes (two hours) to complete the test. Candidates are expected to bring their personal printed paper copy of the Safety Program Handbook in English (published by the Transitional Council of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario) and dictionary to the test as sources of reference. There are no questions that require candidates to create a written response or provide an oral response.

### **Scoring**

A candidate is deemed to have successfully completed the test by correctly answering 70% of the questions. All questions are weighted equally. All tests that have scores below 70% will be re-scored to verify results. After scores have been verified, candidates may not appeal the decision. Candidates are expected to select the best or most suitable answer from the choices available, based solely on the content that is provided in the Safety Program Handbook. Questions that are left blank are scored as incorrect. Questions that have two or more answers identified are scored as incorrect. All questions are scored as either correct (1 mark) or incorrect (0 marks).

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

### **Jurisprudence Course Test**

A bank of multiple-choice Jurisprudence Course test questions was developed by our legal counsel, Richard Steinecke of the law firm Steinecke, Maciura LeBlanc. The examination questions were reviewed and validated by the two non-TCM practitioners on the transitional Council and the Registrar and staff to ensure applicants are able to answer the questions by using the Handbook.

CTCMPAO has not been faced with a situation where test results were below desired levels. The passing rate for the Jurisprudence tests held between October 2012 and December 2013 was approximately 98%; as well, applicants can retake the test until they pass it.

### **Safety Program Test**

CTCMPAO engaged the services of a consultant, Curriculum Services Canada (CSC), to develop the Safety Program Handbook, under the direction of the Steering Committee, comprising Board members of CTCMA-BC and transitional Council members of the TC-CTCMPAO, the Registrars of CTCMA-BC and TC-CTCMPAO. CSC further recruited from BC and Ontario three TCM experts to help draft the technical content of the program handbook. Some 30 register members from BC and practitioners from Ontario then reviewed and verified the handbook content, section by section, and validated the bank of test questions. On behalf of CTCMPAO, CSC completed the validity and reliability assessment of the multiple-choice questions with some 15 volunteer practitioners.

CTCMPAO was not faced with a situation where test results were below desired levels.

The passing rate for the Safety Program tests held between January and December 2013 was approximately 92%.

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

#### **Jurisprudence Course and Safety Program Tests**

Examination questions for both the Jurisprudence Course and Safety Program were developed and offered within the last 12 months. Therefore, currently CTCMPAO does not have any established process to update the examination questions. The current bank of questions is sufficient to conduct the tests for next few years. In future, CTCMPAO will consider developing a process to update and revise the examination questions.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

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

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

- The Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA) to conduct the Registration Examinations- Pan-Canadian Written and Clinical Case-Study Examinations
- Curriculum Services Canada (CSC) to administer and score the Safety Program Test

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

i. provides information about assessment practices to applicants

CTCMPAO recruits its third parties through a comprehensive and rigorous selection process to ensure third parties are able to provide quality services and ensure public safety. CTCMPAO maintains a contractual agreement with all of its third parties to ensure third parties are assessing applicants in a transparent, objective, impartial and fair way. Third parties are also required to provide reports to CTCMPAO to ensure a timely exchange of information and to maintain an open and cooperative working relationship in order to ensure a successful delivery of all Assessments.

## **Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations**

CTCMPAO's Council approved the Registration Examinations—the Pan-Canadian Written and Clinical Case-Study Examinations developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA), with input from Traditional Chinese Medicine (TCM) experts. CARB-TCMPA is the national organization of the provincial and territorial regulatory bodies that govern and monitor the practice Traditional Chinese Medicine Practitioners, TCM Acupuncturists and/or TCM Herbalists.

CARB-TCMPA developed a Blueprint document describing the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations with the purpose and intent of facilitating the development of reliable and valid examinations to assess fairly and transparent manner the candidates applying for registration to practice the TCM profession.

The Blueprint document has two major components: 1) the content domain (practice areas) to be measured and 2) explicit guidelines on how this content is to be measured. The content domain consists of the measurable competencies expected of entry-level TCM practitioners, TCM Acupuncturists and/or TCM Herbalists. The Blueprint also includes a list of suggested references for these Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations.

CTCMPAO has representatives on CARB-TCMPA's Steering Committee, Examination Committee and Blueprint Committee. CTCMPAO attends CARB-TCMPA meetings, provides input into any policy or process or decisions, and reports back to Council on a regular basis.

Applicants can find the Blueprint document and other information regarding the Registration Examinations–Pan-Canadian Written and Clinical Case-Study Examinations on CTCMPAO's website.

### **Safety Program Test-Curriculum Services Canada (CSC)**

Curriculum Services Canada (CSC) had administered and scored the Safety Program Test on behalf of CTCMPAO from January 2013 until June 2013. Information about assessment practices, including candidate instruction guide were linked to CTCMPAO's website.

CTCMPAO worked closely with CSC to ensure successful delivery of the tests as well as offering tests frequently to accommodate applicants waiting to register with CTCMPAO. CSC also provided monthly reports to CTCMPAO regarding the administration of the tests, including recommendations to improve the administration of the next tests, if warranted.

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

CTCMPAO's third parties do not conduct qualification assessments.

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

### **Curriculum Services Canada (CSC)**

Curriculum Services Canada (CSC) was responsible for confirming enrollment and providing timely responses to applicants' inquiries on their applications regarding the logistics and processes for taking the Safety Program Test. CSC sent results of each applicant's assessment to CTCMPAO to advise applicants.

**Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA)**

CARB-TCMPA is not responsible for providing timely decisions or responses to applicants. CTCMPOA confirms enrollment and advises and responds to applicants' inquiries on their applications regarding logistics and processes for taking the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations.

**iv. provides training to individuals assessing qualifications**

Please refer above to 9.b.ii.

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

Our third parties do not have access to credential documents from applicants.

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

Please refer to answer 1p.

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

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

CTCMPOA does not rely on a third party to conduct credential assessments.

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

CTCMPOA does not rely on a third party to conduct credential assessments.

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

CTCMPOA does not rely on a third party to conduct credential assessments.

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

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

CTCMPAO does not rely on a third party to conduct competency assessments.

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

CTCMPAO does not rely on a third party to conduct competency assessments.

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

CTCMPAO does not rely on a third party to conduct competency assessments.

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

i. Describe the methodology used to evaluate prior learning.

CTCMPAO does not rely on a third party to conduct prior learning assessments.

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

CTCMPAO does not rely on a third party to conduct prior learning assessments.

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

CTCMPAO does not rely on a third party to conduct prior learning assessments.

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

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

### **Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations**

#### **Format**

#### **Pan-Canadian Written Examination**

The Pan-Canadian Written Examination consist of multiple-choice questions. The multiple-choice questions are presented either as case-based or independent questions. Case-based questions include a set of approximately three to five questions associated with a brief case scenario. The candidate is required to read the case scenario carefully and use the content to assist in answering all the associated questions. Independent questions contain the information necessary to answer the question. Every question consists of a stem (question) and four possible options. There is only one correct or best answer for each question.

## **Pan-Canadian Clinical Case-Study Examination**

The Pan-Canadian Clinical Case-Study Examination consist of six to eight clinical case-study situations requiring open-ended candidate responses. For each case, the following presenting conditions may be provided:

- Chief complaint(s)
- Symptoms and signs
- General patient information, such as age, gender, occupation and marital status
- Personal history and medications, including supplements
- Family history
- Other necessary information, such as lifestyle, diet, exercise and environmental factors.

Candidate responses to the clinical case-study situations are assessed based on the following six criteria: (a) diagnosis (traditional Chinese medicine illness and syndrome differentiation); (b) etiology and pathogenesis; (c) treatment principles; (d) Acupuncture treatment; (e) herbal therapy; and (f) biomedical diagnosis and treatment considerations.

## **Scoring**

### **Written Examination**

The computer answer sheets are electronically scanned and scored. Quality control reports and checks are completed during and after marking to ensure accuracy. Each multiple-choice question is worth one point. A correct answer receives a score of one point and an incorrect answer receives a score of zero. There is no penalty for incorrect or blank responses. The passing score for the examination is set by the CARB-TCMPA Examination Committee using the modified Angoff method. The modified Angoff method requires each member of the Committee to independently rate each question on the examination in terms of the minimally competent candidate. The minimally competent candidate can be conceptualized as the candidate possessing the minimum level of knowledge and skills necessary to perform at a registration/licensure level. To do the rating, the committee members ask themselves “what percentage of minimally competent candidates will answer this question correctly?” The ratings from all members are then collated and tabulated to achieve the average rating per item. These ratings are then averaged to obtain the passing score for the total examination.

### **Clinical Case-Study Examinations**

Each case-study examination situation, depending on the components of the question, is scored on a scale ranging from 0 (no understanding of the problem) to 4 points (complete response). The final mark for a candidate is simply the sum of all score points for the clinical case-study questions. The passing score for the examination is set by the Examination Committee of the CARB-TCMPA using the extended Angoff method.

Instead of asking participants to estimate the probability of a correct response on a multiple-choice question, the participants are asked to indicate the score a minimally competent candidate would obtain out of the maximum points allowed for the question. Thus, the passing score for the exam is the average rating of all the participants' standard-setting responses.

### **Number of Rewrites**

There are two components to the Registration Examinations-Pan-Canadian Examinations:

- Written examination
- Clinical case study examination

Successfully completing the examination means passing both components. Candidates are required to pass the Written Examination before advancing to take the clinical Case-Study Examination. Candidates must successfully complete the Registration Examinations within three attempts.

Applicants who fail the examination three times are not eligible to repeat the examination unless the candidate completes the further education or training or combination of education and training required by a Panel of the Registration Committee.

## **Safety Program Test**

### **Format**

The Safety Program Test is an open book multiple-choice test with 40 questions. All candidates are allowed up to 120 minutes (2 hours) to complete the test. Candidates are expected to bring their personal printed paper copy of the Safety Program Handbook in English (published by the Transitional Council of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario) to the test as a source of reference. There are no questions that require candidates to create a written response or provide an oral response.

### **Scoring**

A candidate is deemed to have successfully completed the test by correctly answering 70% of the questions. All questions are weighted equally. All tests that have scores below 70% will be re-scored to verify results. After scores have been verified, the candidate may not appeal the decision. Candidates are expected to select the best or most suitable answer from the choices available, based solely on the content that is provided in the Safety Program Handbook. Questions that are left blank are scored as incorrect. Questions that have two or more answers identified are scored as incorrect. All questions are scored as either correct (1 mark) or incorrect (0 marks).

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

### **Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations**

The Registration Examinations-Pan-Canadian Written and Clinical Case-Study examinations are based and have been derived from the *Entry-Level Occupational Competencies for the Practice of Traditional Chinese Medicine in Canada (May 2010)*. The Blueprint document developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA) intends to facilitate the development of reliable and valid examinations to assess fairly, in a consistent and transparent manner, the candidates applying for registration to practise as traditional Chinese medicine (TCM) Practitioners, TCM Acupuncturists and/or TCM Herbalists in Canada. 15-20 TCM experts from all five provinces selected by the CARB-TCMPA Steering Committee reviewed and validated the examination.

The first Written examination was offered in October 2013 and the first Clinical Case-Study Examination was offered in January 2014. The test results of both components of the examinations are not available as of the current date. If results are below desired levels, the CARB-TCMPA Examination Committee will review the questions and will take measures in consultation with the CARB-TCMPA Steering Committee to correct deficiencies.

Each year the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations questions will be reviewed, updated or revised and new questions will be developed by the CARB-TCMPA Examination Committee, consisting of TCM experts from all five provinces. If a question does not perform well in the testing, it will be removed.

### **Safety Program**

CTCMPAO engaged the services of a consultant, Curriculum Services Canada (CSC), to develop the Safety Program Handbook under the direction of the Steering Committee comprising Board members of CTCMA-BC and transitional Council members of the TC-CTCMPAO, the Registrars of CTCMA-BC and TC-CTCMPAO. CSC further recruited from BC and Ontario three experts in TCM to help draft the technical content of the program handbook. Some 30 register members from BC and practitioners from Ontario then reviewed and verified the handbook content, section by section, and validated the bank of test questions. On behalf of CTCMPAO, CSC completed the validity and reliability assessment of the multiple-choice exam questions with some 15 volunteer practitioners.

CTCMPAO has not been faced with a situation where test results were below desired levels. However, if such situation occurs CTCMPAO will take measures to correct deficiencies.

The passing rate for the Safety Program tests held between January and December 2013 was approximately 92%.

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

#### **Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations**

Each year the Registration Examinations-Pan-Canadian Written and Clinical Case-Study Examinations questions will be reviewed, updated or revised and new questions will be developed by the Canadian Alliance of Regulatory Bodies of Traditional Chinese Medicine Practitioners and Acupuncturists (CARB-TCMPA) Examination Committee, comprising TCM experts from all five provinces. If a question does not perform well in the testing, it will be removed.

#### **Safety Program**

Examination questions for Safety Course were developed and offered within the last 12 months. Thus, currently CTCMPAO does not have any established process to update the examination questions. The current bank of questions is sufficient to offer more tests for next few years.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.



## Training (10 / 13)

a) Describe the training that your organization provides to:

i. individuals who assess qualifications

All staff involved in registration participate in orientation and training offered by CTCMPAO's legal counsel. The orientation includes a review of:

- the roles of staff, Committee chair and Committee members;
- registration processes;
- a transparent, objective, impartial and fair assessment process;
- tools, checklists and criteria used for assessment;
- policies and procedures for file assessment;
- a sample file;
- conflicts of interest;
- human rights code;
- confidentiality of information; and
- objectives of the *Fair Access to Regulated Professional and Compulsory Trades Act, 2006*, presented by the Ontario Fairness Commissioner (OFC)

When staff are hired, they receive an orientation to the CTCMPAO, including relevant legislation, policies and procedures. Each staff member has a resource manual for registration policies and procedures, relevant legislation aid in making consistent, fair and impartial decisions. The Director of Registration and Examinations attended a workshop on "Differences in Cultural Backgrounds" offered by the Ontario Regulators for Access Consortium (ORAC) and shared her experience with other staff members of CTCMPAO.

CTCMPAO staff are trained to handle applications from applicants who have completed a full-time traditional Chinese medicine (TCM) or TCM acupuncture education program or equivalent. This training includes verification:

- of whether submitted documents are genuine;
- that transcripts indicate completion of the degree/program;
- of whether the program have the minimum hours of theoretical/practical instruction to meet the definition of full-time education as prescribed in the Registration Regulation;
- of whether the program teaches traditional Chinese medicine (either full traditional Chinese medicine or traditional Chinese medicine acupuncture);
- that certificates indicate completion of the program/degree;
- that program content meets the entry-to-practice competencies;
- of completion of the supervised clinical experience that is part of an education program;
- of declarations and documents verifying good standing with other regulatory provinces;
- of completion of the application, including signature of the applicant; and
- of name against documents, or verification of a name change.

If there is a question whether an application meets the requirements for registration, staff members consult the Registrar for advice.

## ii. individuals who make registration decisions

Registration decisions are made by the Registrar and by the Registration Committee.

All staff involved in registration participates in orientation and training, as do members and the Chair of the Registration Committee.

When the Registrar is hired, he or she receives an orientation to CTCMPAO, including relevant legislation, policies and procedures. The Registrar has a resource manual for registration policies and procedures to aid in making consistent, fair and impartial decisions.

Registration Committee Members receive an orientation before participating in any registration decisions. The orientation includes a review of:

- the roles of staff, Committee chair and Committee members;
- a resource binder for Committee members;
- registration processes;
- a transparent, objective, impartial and fair assessment process;
- tools, checklists and criteria used for assessment;
- policies and procedures for file assessment;
- a sample file;
- conflicts of interest;
- confidentiality of information;
- code of conduct;
- human rights code;
- reasons and decision writing training, facilitated by Richard Steinecke of Steinecke, Maciura LeBlanc; and
- objectives of the *Fair Access to Regulated Professional and Compulsory Trades Act, 2006*, presented by the Ontario Fairness Commissioner (OFC)

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

Same as above.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

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

Examples of agreements on the recognition of professional qualifications include mutual recognition,

reciprocity and labour mobility agreements. Such agreements may be national or international, between regulatory bodies, associations or jurisdictions.

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

CTCMPAO has not entered into any agreements on the recognition of qualifications.

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

CTCMPAO has not entered into any agreements on the recognition of qualifications.

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)

## Data Collection (12 / 13)

### Languages in which application information materials are available

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

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

### Paid staff employed by your organization

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

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

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

Category	Staff
Total staff employed by the regulatory body	11.5
Staff involved in appeals process	2
Staff involved in registration process	11.5

### Countries where internationally educated applicants were initially trained

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

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

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

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

Country of training (Canada excluded)	Number of applicants in the reporting year
China	885
U.S.	40
Korea	34
Russia	28
Japan	23
n/a	
n/a	
n/a	
n/a	
n/a	

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

applicants" field if you track the information, but the correct value is zero.

### Jurisdiction where members were initially trained

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

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

	Jurisdiction where members were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
<b>Members on December 31<sup>st</sup> of the reporting year</b>	837	73	27	906	143	<b>1986</b>

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

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

Additional comments:

### Applications your organization processed in the past year

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

	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
<b>from January 1<sup>st</sup> to December 31<sup>st</sup> of the reporting year</b>						
<b>New applications received</b>	1110	78	40	1084	235	<b>2547</b>

<b>Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)</b>	0	0	0	0	0	<b>0</b>
<b>Inactive applicants (applicants who had no contact with your organization in the reporting year)</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who met all requirements and were authorized to become members but did not become members</b>	1	0	0	0	0	<b>1</b>
<b>Applicants who became FULLY registered members</b>	837	73	27	906	143	<b>1986</b>
<b>Applicants who were authorized to receive an alternative class of licence<sup>3</sup> but were not issued a licence</b>	0	0	0	0	0	<b>0</b>
<b>Applicants who were issued an alternative class of licence<sup>3</sup></b>	112	5	4	32	0	<b>153</b>

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

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

Additional comments:

	<b>Class of licence</b>	<b>Description</b>
		Grandparented class of certificate of registration

<b>a)</b>	Grandparented Class	is intended for existing TCM practitioners who were practising the profession in Canada at the time of proclamation.
<b>b)</b>	General Class	General class of certificate of registration is intended for applicants who have formal education and training in the TCM profession, however may not have substantial work experience.
<b>c)</b>		
<b>d)</b>		
<b>e)</b>		
<b>f)</b>		
<b>g)</b>		
<b>h)</b>		
<b>i)</b>		
<b>j)</b>		

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

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

	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
from January 1 <sup>st</sup> to December 31 <sup>st</sup> of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	27	1	0	12	5	45
Applicants who initiated an appeal of a registration decision	1					1
Appeals heard	0					0
Registration decisions changed following an appeal	0					0

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

Additional comments:

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

CTCMPAO was formally established on April 1, 2013, hence there are no changes to report.

[BACK TO INDEX](#)



## Certification (13 / 13)

I hereby certify that:

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

Name of individual with authority to sign on behalf of the organization: Cristina DeCaprio

Title: Registrar & CEO

Date: February 28, 2014

[BACK TO INDEX](#)

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