

# College of TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS of Ontario

## 2024 Fair Registration Practices Report

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**Prepared for the Office of the Fairness Commissioner (OFC)**



**FAIRNESS** COMMISSIONER  
COMMISSAIRE À L'ÉQUITÉ

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# 1. Background

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

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

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

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

Please note that this report covers the time-period from January 1 to December 31, 2024.

The FRP:

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

## 2. Organization information

<b>Organization name</b>	College of TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS of Ontario
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## 3. Registration requirements

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

Licensing requirements (brief description for each requirement listed):

<b>Profession/ Trade Name</b>	Traditional Chinese Medicine Practitioner and Acupuncturist
<b>Academic requirement</b>	For TCM Practitioners: completion of a 4-year full-time program. For Acupuncturists: completion of a 3-year full-time program.
<b>Experience requirement</b>	A minimum of 45 weeks of supervised clinical training involving at least 500 hours of direct patient contact.
<b>Language requirement</b>	Reasonable fluency in English or French

<b>Additional information on licensing requirements (may include links to appropriate page on regulator website):</b>	Successful completion of an entry-to-practice exam, as well as tests for a safety program and a jurisprudence course.

## 4. Third party assessments

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

<b>Organization name</b>	<b>Function</b>
CARB-TCMPA	Knowledge based exam
Captus Press	Jurisprudence exam

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

College of TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

Captus Press administers the College's Jurisprudence and Safety tests, which are offered online and on-demand. Procedures have been established to ensure that proper testing protocols are followed, and staff maintain regular communications with Captus to adapt processes to changing conditions, as necessary. CARB-TCMPA administers the entry-to-practice exams nationally, for jurisdictions where the profession is regulated. College representatives are members of CARB-TCMPA's board and steering committee, and can provide input and direction to ensure that exam-related services are fair and appropriate.

## 5. Accomplishments, risks and mitigations

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

### A. Accomplishments

1	We updated our Supervisor policy for Members to include more robust requirements for eligibility as a supervisor. This policy helps to ensure appropriate guidance, and thus public safety, for new registrants who require supervised practice.
2	We revised our webpage related to the entry-to-practice examinations to more clearly present information about the exam schedule, fees and the application process.

### B. Risks and Mitigations

Risk	Mitigation Measure
Potentially inconsistent standards across TCM education programs in Ontario.	The College is developing an approval process for education programs that is intended to promote high standards and consistency among education providers. The Pilot phase of the project was successfully concluded in 2024 and the program is expected to launch in 2025.

## 6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

### A. Registration requirements and practices

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
Registration requirements either through regulation, by-law or policy	Yes	To support public safety, the College's policy outlining the requirements for registrants transferring from the Inactive class to the General class has been updated to ensure the currency of their knowledge and skills. Additionally, in the interest of transparency, a table that sets out possible remedial measures for currency deficiencies has been added to the policy.
New or consolidated class of certificates or licenses	No	
Assessment of qualifications, including competency-based assessments and examinations	No	
Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	No	
Changes to internal review or appeal process	No	
Access by applicants to their records	No	

Other	No	
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## B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	Staff participated in training and workshops on registration-related topics, including sessions hosted by the Canadian Network of Agencies for Regulation (CNAR) and training delivered to the Registration Committee. Staff also engaged legal expertise as needed, and participated in meetings amongst other regulators to discuss topics of common interest and to share best practices.
Resources or training to support applicants to move through the licensing process	Yes	College staff delivered information sessions both online and in person to the graduating classes of Ontario schools, to explain the registration requirements and process. Bilingual support is also offered when responding to inquiries from applicants.
Anti-racism and inclusion-based policies and practices	Yes	The College continues to participate in HPRO's EDI initiatives.

## C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	No	

Accreditation of educational programs	Yes	The College completed the Pilot phase of the education program approval process that it is developing internally.
Mutual recognition agreements	No	

## D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	No	
Technological or digital improvements	No	
Steps to address labour shortages in the profession or trade	No	

## 7. Membership and application data

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

### A. Race-based data collected

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

Additional description:

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## B. Other identity-based or demographic data collected

	<b>Other identity-based or demographic data collected? (Yes or No)</b>
Members	No
Applicants	No

Additional description:

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## C. Languages of service provision

College of TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS of Ontario makes application materials and information available to applicants in the following languages.

<b>Language</b>	<b>Yes / No</b>
English	Yes
French	Yes
Other (please specify)	French upon request.

## D. Membership Profile

<b>Profession Name</b>	<b>Total Number of Members</b>
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Traditional Chinese Medicine Practitioner and Acupuncturist	3047
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Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	2668	392
Inactive Class	176	23
Student Class	3	0
General Class with Terms, Conditions or Limitations	200	17

Gender	Number of Members
Female	2007
Male	1040

Jurisdiction of Initial Training	Number of Members
Ontario	1434
Other provinces and territories	97
United States	27
Other International	405
Other/not collected	1084

Country of Initial Training	Number of Members
Canada	1531
China	326
United States of America	27
Hong Kong	22

Taiwan	18
South Korea	11
Japan	10
Australia	5
United Kingdom	3
Sri Lanka	3
Israel	3
Moldova	1
New Zealand	1
Pakistan	1
Russia	1
Other Countries	1084

Official language of preference	Number of Members
English	3047

Racial identity (optional)	Number of Members
Not collected	3047

## E. Data Notes

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## F. Applicant Profile

Profession Name	Total Number of Applicants
Traditional Chinese Medicine Practitioner and Acupuncturist	271

Gender	Number of Applicants
Female	211
Male	60

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario	191	13
Other provinces and territories	62	12
Other International	18	3

Country of Initial Training	Number of Applicants
Canada	253
China	9
Hong Kong	6
Taiwan	3

Official language of preference	Number of Applicants
English	271

Racial identity (optional)	Number of Applicants
Not collected	271

## G. Data Notes

Applications in progress at the end of the year include those that were incomplete and those where the applicant chose to delay registration until 2025.

## H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2024. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	186	0	0
Other provinces and territories	41	0	0
Other International	23	0	0

## I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Full / General/ Independent Practice	227	18
Student Class	3	0
General Class with Terms, Conditions or Limitations	20	5

## J. Data Notes

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## K. Reviews and Appeals

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

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	0	0
Other provinces and territories	0	0
United States	0	0
Other International	0	0

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

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

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

Issue or reason raised	Number of appeals
1. Not applicable	0

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

Reason for not registering	Number of internationally trained applicants
1. Not applicable	0

## L. Data Notes

The CTCMPAO did not refuse registration for any applicant in 2024, and so did not encounter reviews or appeals over such a decision.

## Glossary of terms

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

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

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

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

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

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

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



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

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