

# Royal College of DENTAL SURGEONS 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>	Royal College of DENTAL SURGEONS 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 Royal College of DENTAL SURGEONS of Ontario

Licensing requirements (brief description for each requirement listed):

<b>Profession/ Trade Name</b>	Dentist
<b>Academic requirement</b>	4-year university-based dental degree Successful completion of the National Dental Examining Board of Canada (NDEB) examinations leading to a Certificate of completion of the NDEB
<b>Experience requirement</b>	Continuous practice requirement: since completing NDEB certification, there is no three-year period in which the

	applicant has not practised dentistry on a continuous and regular basis in Canada or the United States. This requirement has been expanded by policy to include any jurisdiction recognized by the Commission on Dental Accreditation of Canada (currently includes Ireland, Australia, New Zealand) .
<b>Language requirement</b>	Proficiency in English or French according to the RCDSO's Language Proficiency Policy available on the RCDSO's website.
<b>Additional information on licensing requirements (may include links to appropriate page on regulator website):</b>	Additional registration requirements include: - Successful completion of the RCDSO's examination in ethics and jurisprudence - Authorization to work in Canada (Canadian citizen, permanent resident or other authorization under the Immigration and Refugee Protection Act) - Certificates of Professional Standing from jurisdictions in which the applicant is currently, or was previously, registered to confirm good standing - Completion of an online application form with questions on education history, professional history, conduct and health history

## 4. Third party assessments

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

<b>Organization name</b>	<b>Function</b>
National Dental Examining Board of Canada	Knowledge based exam
National Dental Examining Board of Canada	Academic credential evaluation
National Dental Examining Board of Canada	OSCE / Skill based exam
National Dental Examining Board of Canada	Competency-based assessment

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.

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

The NDEB establishes and maintains a national standard of competence of dentists in Canada. It develops and administers examinations and assessments for dentists seeking licensure with a Canadian dental regulator. The RCDSO oversees this work in a variety of ways: 1. The RCDSO-NDEB MOU, in place since June 2023. The MOU enables the RCDSO to ensure that credentialing and assessment services are conducted in a way that is transparent, fair, and impartial according to our obligations under the Health Professions Procedural Code. Past OFC Reports and the 2023 RICF Questionnaire speak to the process of establishing the MOU and how it strengthens our accountability relationship with the NDEB. Leaders from the NDEB and RCDSO completed a one-year review of the MOU in May 2024, which provided an opportunity to review the terms of the agreement, share updates on progress, and re-confirm our respective commitments. The MOU will be reviewed thereafter on a three-year cycle. 2. Dental Regulatory Authorities at the national level through the Canadian Dental Regulatory Authorities Federation (CDRAF) oversee the work of the NDEB. The CDRAF incorporated a review of NDEB processes into its strategic plan (2023-2026), including a review of service standards, application procedures and outcomes. A multi-stakeholder working group is currently reviewing the NDEB's processes. RCDSO's Registrar Chair's this working group. The NDEB provides

annual technical briefings and a report including key data and outcomes to the CDRAF annually. 3. A member of the RCDSO Council participates in NDEB governance by sitting on the NDEB Board. 4. Informal structures are in place to allow RCDSO to monitor performance: NDEB attends CDRAF Board meetings to provide updates on activities; RCDSO representatives attend NDEB workshops for standard setting, and act as examiners and graders for exams; and the RCDSO and NDEB regularly engage in direct communication to provide updates and share concerns.

## 5. Accomplishments, risks and mitigations

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

### A. Accomplishments

1	Continuing to strengthen our accountability relationship with the National Dental Examining Board of Canada (NDEB) through continued communication at the provincial and national level and the establishment of a multi-stakeholder working group at the national level to review the NDEB's equivalency process, which is chaired by the RCDSO. As a result of the working group, the NDEB has introduced a plan to reduce the duration of the equivalency process through a combination of considering eligibility criteria, increasing seat capacity and introducing priority registration.
2	Successfully processing over 800 applications for registration while maintaining the regulated registration timelines without exception (15 and 30 days) which exemplifies our commitment to fair registration processes and to quality service delivery. This was achieved while also processing over 900 applications for certificates of authorization for Health Profession Corporations, and processing over 400 requests from current and former registrants for certificates of standing to be sent to other regulators.
3	In 2024, we developed a common regulatory risk framework and tool to be used by all RCDSO program areas with the aim of increasing transparency and consistency of decision-making by RCDSO committees, including the registration committee. This will improve fair registration outcomes for applicants who will have more information about how registration committee

<p>decisions are made in the public interest, guided by risk. The registration committee approved the updated risk framework and tool in 2024 and it will be used for all registration committee decisions in 2025.</p> <p>(<a href="https://cdn.agilitycms.com/rcdso/pdf/RCDSO_Risk%20Assessment%20Framework%20and%20Tool.pdf">https://cdn.agilitycms.com/rcdso/pdf/RCDSO_Risk%20Assessment%20Framework%20and%20Tool.pdf</a>).</p>
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## B. Risks and Mitigations

Risk	Mitigation Measure
Third party accountability and the need to further improve the fairness, timeliness and accessibility of the assessment process for international trained dentists.	Maintain ongoing dialogue with the NDEB and driving accountability for process improvements; support the multi-stakeholder working group struck to critically assess NDEB's equivalency process for which the RCDSO is currently the chair.
Availability of examination time slots for the exams in the NDEB equivalency process.	The RCDSO-NDEB MOU and national multi-stakeholder working group address this issue. In 2024, the NDEB increased its test capacity for the NDECC exam by 20%. An additional 240 seats over the 2024 capacity will be offered in 2025. The additional seats combined with changes to the registration process for the NDECC exam should decrease the time it takes candidates to complete the exams in the Equivalency Process.
Need for additional approaches to assist candidates whose NDEB results place them on the cusp of competence but who lack certain discrete knowledge or skills gaps.	In 2024, the Association of Canadian Faculties of Dentistry (ACFD) has received grant funding to develop an alternative pathway to registration for ITDs who have small knowledge and skills gaps to facilitate their successful entry to practice in Canada. Development of the alternative pathway is well underway and we

	understand a pilot of the program will start in September 2025.
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# 6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, Royal College of DENTAL SURGEONS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

## A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	No	
New or consolidated class of certificates or licenses	No	
Assessment of qualifications, including competency-based assessments and examinations	Yes	In 2024, the NDEB transitioned the administration of the National Dental Specialty Exam to the Royal College of Dentists of Canada (RCDC). The transition was smooth and the first specialty exam was administered by the RCDC in June 2024 without issue.
Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	



Registration and/or assessment fees	Yes	The RCDSO annual fee increased in 2024 by \$95, from \$3075 to \$3170. RCDSO Council approved the annual fee increases would include a Cost-of-Living Adjustment (COLA) based on the June Ontario CPI of 3% rounded to the nearest \$5. Both the semi-annual and quarterly annual fees also increased at the same rate from \$1540 to \$1585, and \$885 to \$910, respectively. Note that the semi and quarterly annual fee are only available to new registrants.
Changes to internal review or appeal process	No	
Access by applicants to their records	No	
Other	No	

## B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	In 2024, RCDSO staff continued to review and update process and training documents to ensure resources are current and reflect the most up-to-date processes. We now have a repository of process documents for almost all types of certificates, as well as a number of resources, training videos and information about our registration processes, such as renewal, processing Certificates of Registration for Health Professional Corporations, Registration Committee support, and more. All staff, including registration staff, are on a continuous learning journey as it relates to training in Equity Diversity and Inclusion ("EDI") and building their cultural competency to ensure registration services are provided in a way that is

		equitable, transparent and fair. Staff have received mandatory training related to EDI fundamentals, unconscious bias, AODA customer service, and leaders receive training on managing bias in hiring. In 2024, several opportunities related to understanding the impact of systemic racism were made available to staff for learning and discussion. In fall 2024, members of the RCDSO leadership group completed a learning session on Truth and Reconciliation and worked through facilitated regulatory case scenarios related to EDI Issues in our work led by Dr. Saroo Sharda, Associate Dean of Equity and Inclusion at McMaster University. The College continues to hold an Employer Partnership with the Canadian Centre for Diversity and Inclusion and Diversio – all staff have access to a wide range of learning content on demand, courses and conferences.
Resources or training to support applicants to move through the licensing process	Yes	In 2024, we launched a new welcome module for new registrants: Introduction to the RCDSO - Overview ( <a href="https://cdn.agilitycms.com/rcdso/introduction-to-the-rcdso/content/index.html#/">https://cdn.agilitycms.com/rcdso/introduction-to-the-rcdso/content/index.html#/</a> ). The module contains information on the College's purpose, standards, quality assurance requirements, mandatory reporting and other resources. Every new applicant is provided with a link to the module in our confirmation of registration email. Each year, registration staff present to 4th year students at the two dental faculties in Ontario about application and process requirements, including those students who are completing a qualifying program (i.e. their dental education was completed at school that is not accredited by our national accreditation body). Staff prepare a detailed memo for the students on application requirements compiled from information on our website, as well as an FAQ document. Staff also allow time for a Q&A session following the presentation to answer applicants' specific questions.
Anti-racism and	Yes	The RCDSO continues to focus on EDI as part of the RCDSO 2023-2025 Strategic Plan. Within the plan, an EDI

inclusion-based policies and practices		<p>project has been established to build EDI accountability into our daily operations and regulatory work with registration as a priority area. Staff, Council and committee members actively participate in regular anti-racism and inclusion-based training. This learning helps to support ensuring all applicants regardless of their race, ethnicity, or background, have equal access to the registration process. In 2024, the registration area completed a review of their work using the HPRO EDI Action Guide Self Assessment Tool (<a href="https://www.regulatedhealthprofessions.on.ca/assets/hpro-ed-organizational-self-assessment-and-action-guide.pdf">https://www.regulatedhealthprofessions.on.ca/assets/hpro-ed-organizational-self-assessment-and-action-guide.pdf</a>) and developed an EDI commitment statement to signal our commitment to the work. Through the review staff identified many existing positive practices, as well as opportunities for improvement of EDI practices specific to registration. We will be reviewing the Action Plan in 2025 to identify areas of focus. In September 2024, the Council of the RCDSO released an Equity, Diversity and Inclusion commitment statement from Council with a directive on the principals and practices the College will adhere to (<a href="https://www.rcdso.org/about-rcdso/equity-diversity-inclusion">https://www.rcdso.org/about-rcdso/equity-diversity-inclusion</a>).</p>
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### C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	Yes	<p>In 2024, the RCDSO continued to strengthen its relationship with our third-party service provider, the NDEB: • In May 2024, senior leaders from the NDEB and RCDSO completed a one-year review of the MOU (signed in June 2023) and confirmed that the MOU is functioning well, that the objectives of the MOU are being met, that all accountability supports and reporting required under the MOU is</p>

		taking place, and that the two organizations are communicating well. • The RCDSO acts as chair to the national working group established to critically assess NDEB's equivalency process. • RCDSO maintains an ongoing dialogue with the NDEB to drive accountability for process improvements. As a result of the MOU and working group, the NDEB will introduce a plan to reduce the duration of the equivalency process for all candidates through a combination of consideration eligibility criteria, increasing seat capacity and prioritization of exams. • Additional mechanisms to increase and maintain accountability of NDEB are outlined under "Third Party Assessments"
Accreditation of educational programs	No	
Mutual recognition agreements	No	

#### D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	In 2024, registration staff completed implementation of the emergency class certificate of registration. This work included finalizing implementation tools and process plans to be used if/when the class is opened.
Technological or digital improvements	Yes	In 2024 we made a number of improvements to our digital systems to improve efficiencies, enhance clarity and the improve the applicant experience: • Technological updates to streamline payment systems and allow for online payment for all types of applications. •

		Development of a digital application for emergency class registrants if and when the class is opened. • Updates to the display of our language proficiency policy on the website to improve readability and enhance clarity for applicants. • Introduced automated confirmation of registration emails based on the status of the application in our customer management system further enhancing our registration process and improving the efficiency of the process for the applicant.
Steps to address labour shortages in the profession or trade	Yes	The RCDSO fulfills its duty to respond to labour market shortages by taking a number of proactive steps to obtain data from the profession and to better understand the oral healthcare landscape in Ontario from a health human resource planning perspective and to collect and share data with the Ministry. Those steps were outlined in the RCDSO's 2023 RICF questionnaire. The RCDSO is not aware of any data or other evidence to demonstrate that there currently is a labour market shortage in dentistry in Ontario.

## 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

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

Additional description:

## **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:

## **C. Languages of service provision**

Royal College of DENTAL SURGEONS 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)	

## **D. Membership Profile**

Profession Name	Total Number of Members
Dentist	11313

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice Provisional (education, graduate and short duration licenses)	11268 45	5539 27

Gender	Number of Members
Male	6151
Female	5162
Other / not collected	0

Jurisdiction of Initial Training	Number of Members
Ontario	4564
Other provinces and territories	1183
United States	1311
Other International	4255

Country of Initial Training	Number of Members
Canada	5747
United States of America	1311
India	1243
Iran	463
Australia	286

Iraq	268
Egypt	225
Ireland	136
Philippines	123
Syria	120
Pakistan	116
Romania	112
China	97
Poland	77
Hungary	58
Other Countries	931

Official language of preference	Number of Members
English	11313

Racial identity (optional)	Number of Members
Not collected	11313

## E. Data Notes

The data in this section is reported based on numbers of registrants under each required category. Prior to 2023, the RCDSO reported the data in this section based on numbers of certificates of registration, rather than people, because a person can hold more than one certificate of registration and we wanted to ensure all relevant data was captured. From 2023 onward, data is reported based on numbers of registrants to ensure the totals added up as required by the report template. This shift in reporting requirements/how the data is reported could impact analysis of RCDSO data year over year. The RCDSO does not collect language of preference from registrants at this time. When a dentist applies to the RCDSO, we ask whether they are fluent in English and/or French. Given that there is no option to select "not collected", or report on more than one language per registrant, in question A.5, we've responded with 100%



English as the default. At the College we know that race-based data is a valuable tool for understanding inequities and barriers. Before we collect data from the profession, this College has chosen to first prioritize that staff and decision makers have education, awareness, inclusive practices, representation and accountability to support future EDI efforts including data collection. We have been careful with this learning and unlearning work first to ensure that any race-based data that we collect is handled sensitively and responsibly. It is our opinion that this foundational work will help prevent misuse of the data, guard against bias in our analysis, and help us build the right infrastructure to ensure the highest standards of security and privacy of the data. We are confident in our near future readiness to engage in this type of data collection. We will provide an update on this topic for the OFC in 2025.

#### F. Applicant Profile

Profession Name	Total Number of Applicants
Dentist	918

Gender	Number of Applicants
Male	402
Female	516
Other / not collected	0

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario	204	4
Other provinces and territories	96	5
United States	61	5
Other International	541	54

Other/not collected	16	
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Country of Initial Training	Number of Applicants
Canada	300
India	240
Iran	61
United States of America	61
Australia	40
Egypt	28
Ireland	28
Iraq	18
Syria	18
Pakistan	13
Philippines	7
Brazil	6
United Arab Emirates	6
Hungary	5
Jordan	5
Other Countries	82

Official language of preference	Number of Applicants
English	918

Racial identity (optional)	Number of Applicants
Not collected	918

## G. Data Notes

The volume of applications pending at the end of the reporting year reported in B.2 includes applicants whose application was approved in 2024, but the applicant is not yet registered because they have chosen to hold their registration until the new year to avoid having to renew their license before December 31. The RCSO does not collect language of preference from applicants, only language of fluency from which they can select English and/or French. The RCDSO does not collect racial identity from applicants at this time – see comments in A.7

## 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.

<b>Jurisdiction of initial training</b>	<b>Successful</b>	<b>Unsuccessful</b>	<b>Withdrawn</b>
Ontario	187	1	8
Other provinces and territories	85	1	3
United States	56	0	4
Other International	521	0	7
Other/not collected			2

## I. New Registrants

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

<b>Class of registration</b>	<b>Total new registrants</b>	<b>Number of internationally educated registrants</b>
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Full / General/ Independent Practice Provisional (graduate, education and short duration licenses)	823 26	563 14
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## J. Data Notes

The data reported in question B.8 does not add up to 918 (the total number reported in B0) because a portion of those who applied in 2024 did not subsequently register and/or they were registered but subsequently resigned or were suspended for non-payment of fees.

## K. Reviews and Appeals

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

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	5	0
Other provinces and territories	2	0
United States	1	0
Other International	6	0
Multiple Jurisdictions	3	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.

<b>Jurisdiction of initial training</b>	<b>Number of applicants who sought external review or appeal</b>	<b>Number of decisions changed following external review or appeal</b>
Ontario	0	0
Other provinces and territories	0	0
United States	0	0
Other International	0	0
Multiple Jurisdictions	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.

<b>Issue or reason raised</b>	<b>Number of appeals</b>

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

<b>Reason for not registering</b>	<b>Number of internationally trained applicants</b>
1. Withdrawn: application was submitted and subsequently withdrawn by applicant	11
2. Discarded: Applicant cancels or discards application before it is submitted or does not proceed	6
3. Expired: Application expired	3

after being inactive for a period of time	
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## L. Data Notes

The RCDSO interprets question B.10 as asking us to report the number of files referred to/considered ("reviewed") by the Registration Committee in the reporting year. These are original considerations, not re-considerations. The RCDSO does not have an internal appeals process. No decisions of the Registration Committee were appealed or re-considered in 2024.

# 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.