

College of DENTAL TECHNOLOGISTS of Ontario

2025 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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Glossary of terms

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, 2025.

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

Organization name	College of DENTAL TECHNOLOGISTS 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 DENTAL TECHNOLOGISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Dental Technologist
Academic requirement	A. successfully completed Grade 12 or its equivalent, and B. successfully completed an approved program in dental technology at a College of Applied Arts and Technology in Ontario, or at an educational institution outside of Ontario that the Registration Committee considers to be the

	equivalent to the educational program currently being taught in the Colleges of Applied Arts and Technology in Ontario
Experience requirement	None
Language requirement	Fluency in English/French
Additional information on licensing requirements (may include links to appropriate page on regulator website):	1. Competency Assessments (Knowledge-Based Assessment, Performance-Based Assessment and Jurisprudence & Ethics). 2. Proof of employment eligibility 3. Proof of professional liability insurance 4. Declarations of good character

4. Third party assessments

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

Organization name	Function
Canadian Alliance of Dental Technology Regulators (CADTR)	Academic credential evaluation
Canadian Alliance of Dental Technology Regulators (CADTR)	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.

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

The Memorandum of Understanding (MOU) between CADTR and CDTO, effective January 1, 2021, establishes an accountability framework for monitoring CADTR's performance in adherence to CDTO's laws, standards, and the principles of transparency, objectivity, impartiality, and fairness (TOIF). The MOU mandates that CADTR regularly reports to CDTO on several key metrics, including: - Website availability and uptime - Duration, outcomes, and remediation of the credentialing process - Response times to applicant and regulator inquiries - Progress on services available in both French and English - Time to release credentialing and DTETPA results - Applicant numbers for each entry route - Competency assessment standards, pass/fail rates - Reviews of policies on fees, credentialing documents, and competency assessments - Administrative reconsideration and appeal processes - Financial measures and targets for a 3-year outlook and annual budgets. The CDTO Registrar, who serves as both a CADTR Board Director and the Board Chair, receives these reports directly. CDTO is satisfied that CADTR is delivering credentialing and assessment services in compliance with the TOIF principles and applicable Ontario laws. Should any concerns regarding the efficiency or fairness of CADTR's services be raised by an applicant, the process that CADTR must follow is clearly outlined in the MOU.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Reducing Barriers to Registration 1. In 2025, the College explored initiatives to reduce barriers to registration and advance its strategic priority of professional excellence. The College completed two initiatives. Exemption of the College Jurisprudence and Ethics Examination for George Brown College (GBC) graduates in 2025 and beyond. The decision was based on an independent third-party verification that the GBC 3rd year course and examination in Jurisprudence, Ethics and Professionalism is substantially equivalent to the CDTO's Jurisprudence & Ethics Guide and Examination. By passing the GBC course the applicant for registration has the exposure to, and knowledge of, the same content that make up the College's current
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	jurisprudence requirement. Reduction of Jurisprudence and Ethics Exam and Registration Application Fees for new applicants. The reduction of associated fees for new applicants was based on the student feedback on financial barriers to registration and assurance that the decision would not negatively impact the College's long term financial stability. Board Package- June 20, 2025 – 144th Board Package (PDF)-https://cdto.ca/wp-content/uploads/2025-06-20-Board-Meeting-Public-Package.pdf – Agenda Items 7.1 Jurisprudence and Ethics and 9.2 BN - 2025-2026 Operating Budget
2	Labour Mobility – As of Right On April 16, 2025, the Ontario government introduced the Protect Ontario through Free Trade Within Canada Act to unlock free trade and labour mobility of regulated health professionals within Canada. CDTO participated in Ministry of Health consultations and surveys that led to the expansion of As of Right legislation to the profession of dental technology enabling eligible regulated health professionals who are licensed elsewhere in Canada to begin working in Ontario without delay. In preparation of an implementation date of January 1, 2026, CDTO collaborated with HPRO Colleges to develop processes and tools needed for eligible applicants to practise in Ontario for a one-time period of six months while they complete CDTO's registration process. This includes developing an attestation form to confirm that the applicant meets the requirements, an application process for a certificate of registration that is valid for a one-time period of six months from date of application and creating a webpage for applicants to access up to date information and forms. Board Package - https://cdto.ca/wp-content/uploads/143rd-Board-Meeting-Mins-Apr-25-2025.pdf-9.1 Protecting Ontario through Free Trade Within Canada Act https://cdto.ca/as-of-right-legislation-in-effect-january-1-2026/ — CDTO's main applicant page explaining eligibility, the one-time six-month As of Right period, and the steps to qualify. https://cdto.ca/as-of-right-legislation-in-effect-january-1-2026/ — CDTO news post announcing the launch of the framework and summarizing what changed. https://cdto.ca/wp-content/uploads/CDTO-Attestation-Form.pdf-the PDF applicants submit to confirm they meet the As of Right requirements. Ontario Regulation 321/25, Exemption – Restricted Titles — the regulation CDTO cites for the As of Right eligibility requirements. Ministry of Health – As of Right Guidance Document — the external guidance document linked from CDTO's As of Right resources section.

3	Prior Learning Assessment and Recognition (PLAR) The CDTO continues to collaborate with the Canadian Alliance of Dental Technology Regulators (CADTR) on the Access to Dental Technology (ADT) Phase II project. This initiative expands pan-Canadian solutions achieved in ADT Phase I, to harmonize entry-to-practice requirements for the dental technology profession, reduce registration barriers, enhance labour mobility, and promote inclusive workforce development strategies that can adapt to the rapidly evolving labor market. It will also provide assurance of public protection through improved consistency and rigour in assessments for all applicants entering the practice. The federal government's commitment to investing in patients and the public through the foreign credential recognition program has been unwavering since 2015 and relies on the collaboration with provinces and territories. In October 2025 an additional \$77,000 was awarded, bringing the total award to \$764,000 for ADT II. The project objective is to expand the credentialing pathway for domestically and internationally educated and trained dental lab associates and assistants. A new pathway, the Prior Learning and Assessment Recognition (PLAR), recognizes that a significant number of individuals acquire knowledge, skills and attitudes (entry-to-practice competencies) which reflect the educational standards of approved dental technology programs in Canada through non-formal education and significant on-the-job experience. This pathway gives candidates who were unsuccessful in the DTEE another chance to address gaps in their formal education. Project funding also supports awareness and communication efforts, pre-arrival tools for applicants, a secure and accessible evidence repository, competency upgrading and gap-filling supports, and updates to policies and handbooks for content and AODA compliance.
4	Continued PLAR: Additional 2025 milestones included completing environmental scans on pre-arrival supports, outreach materials, and education upgrading tools; launching multi-channel recruitment through 22 dental health organizations and the CADTR website, which generated 36 expressions of interest and 28 pilot participants; identifying recommendations and resources for structured gap-filling supports; securing additional ESDC funding to strengthen a sustainable bridging model; and hosting town halls and webinars to raise awareness of CADTR CAS pathways and build partnerships with educators and newcomer support agencies. CADTR Releases 2025 Annual Report - Canadian Alliance of Dental Technology

	Regulators Public meeting materials detailing PLAR discussions: Board Package, April 25, 2025 – Agenda Item 10.3 PE – Prior Learning Assessment and Recognition- presentation- https://cdto.ca/wp-content/uploads/143rd-Public-Board-Meeting-Package.pdf Board Package, June 20, 2025 – Agenda Item 11.2.1. Prior Learning Assessment Recognition – presentation - 1. 144th Board Meeting Public https://cdto.ca/wp-content/uploads/2025-06-20-Board-Meeting-Public-Package.pdf Board Package, September 26, 2025 – Agenda Item 8.3.1. Prior Learning Assessment Recognition Engagement – presentation - 1. 145th Board Meeting https://cdto.ca/wp-content/uploads/145th-Board-Meeting-Public-Package-1.pdf Board Package, December 5, 2025 – Agenda Item 8.2.1. Prior Learning Assessment Recognition Engagement - presentation - 1. 146th Board Meeting- https://cdto.ca/wp-content/uploads/146th-Board-Meeting-Public-Package-1.pdf
5	Equity Diversity and Inclusion (EDI) CDTO continues to advance the goal of equity, diversity, and inclusion in pursuit of strategic pillar regulatory excellence. In 2025 the College embedded EDI into governance, education, policy development, and registration practices. This includes launching race-based data collection through annual renewal in September 2025, providing EDI training for the Board to strengthen governance evaluation under the HPRO framework, and supporting Board and staff learning through initiatives such as GBC Indigenous education. An important part of this work has been creating EDI governance and board policies, starting with the Equity, Diversity and Inclusion Policy for the Board of Directors. This policy acknowledges that directors, as stewards of the CDTO, must model principles of EDI in its governance roles and responsibilities. The Board that sets the expectations and values for Board for the whole organization. The Board set the direction for the organization by approving the EDI Organizational Policy. The policy applies to all members of the College community, including Registrants, staff, Board directors, non-Board committee members, members of the public, and all members participating in college related work, programs, or activities. It applies to all College-related interactions, decisions, and the creation or review of policies, procedures, and practices. CDTO adapted the HPRO Equity Impact Assessment (EIA) checklist and tool to help staff and leadership consider whether a decision, policy, or process could create barriers or affect some groups differently. The College implemented core public-facing EDI pages on CDTO's website-https://cdto.ca/equity-diversity-and-inclusion/

6	Continued: EDI-related Board packages/minutes: These are the public Board materials most directly tied to EDI work. •April 25, 2025 – 143rd Board Meeting Minutes (PDF)- https://cdto.ca/wp-content/uploads/143rd-Board-Meeting-Mins-Apr-25-2025.pdf — Records the Board EDI workshop and review of the governance domain of HPRO’s EDI Organizational Self-Assessment Tool. June 20, 2025 – 144th Board Package (PDF) https://cdto.ca/wp-content/uploads/2025-06-20-Board-Meeting-Public-Package.pdf — Agenda Item 11.3 under the Strategic Plan reporting includes a KPIs report for Equity, Diversity, Inclusion and Indigeneity and a list of EDI initiatives completed in 2024–2025. September 26, 2025 – 145th Board Package (PDF) - https://cdto.ca/wp-content/uploads/145th-Board-Meeting-Public-Package-1.pdf — Agenda Item 8.5 under Equity, Diversity, and Inclusion indicates it includes the EDI Board Policy (Governance) and EDI Organizational Policy
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B. Risks and Mitigations

Risk	Mitigation Measure
Dental lab associates are not regulated and have significant dental technology work experience prior to application. The College does not have a requirement for reference letters from a supervising RDT or dentist for suitability to practice. Discovery of unsuitable past conduct after registration can lead to poor registration outcomes and lack of public trust.	The College has proposed several permanent solutions to the Ministry of Health through amendments to the Registration Regulation to mitigate the impact of this risk. The amendments include: 1. Add a Limited Class of Registration for dental lab associates who demonstrate competence in a single discipline of the dental technology practice. 2. Add a scope of practice and registration class for dental lab associates. 3. Expand the non-exemptible registration requirement to include Prior Learning Assessment Recognition (PLAR). Another measure taken to mitigate this risk is collaborating with the dental technology profession association to create a voluntary register for dental lab associates. This allows the College and the Association to educate dental

	lab associates on the ethical, professional and practice standards required to practice the profession in a competent, safe and ethical manner.
Limited number of classes of registration may lead to poor registration outcomes needed to meet the objective of ensuring the public has access to the care of regulated dental technologists and As of Right.	The College has proposed a new "Limited" class of registration that enables registrants to practice in single disciplines and allows them to ladder up to a General Class of registration over time. This new class of registration will allow registrants in Alberta to apply for registration in Ontario under As of Right and Labour Mobility. The Limited class will also support expansion of the Canadian Dental Care Plan (CDCP) which resulted in an increase in demand for restorative services that can be met by RDTs licensed in single and not all disciplines. The College has proposed recognizing PLAR as an alternative to formal education offered by educational institutions. This mitigation measure will allow applicants with significant dental lab experience in one or more but not all disciplines to be licensed to practice.
Significant decrease in the total number of registrants who provide access to good oral healthcare in dental prosthetics and appliances. This could be a result of affordability of licensing and the regulation permitting unregulated individuals to practice the profession under supervision.	The primary mitigation measure aimed at addressing this risk is centered on student, educator, employer and dental lab associate engagement, including: 1. Board workshops held with 110 George Brown College dental technology program students across 3 years. Presentations covered CDTO's role, RDT licensure, and efforts to reduce registration barriers. Focus groups gathered feedback on students'

	licensing challenges. 2. Meeting with the Associate Dean, School of Dental Health, to explore ways to connect with students, reduce program attrition, and increase licensure rates. 3. Creating a student mentorship program pairing students with experienced RDTs to support career development and ease the transition into professional practice. 4. Conducting an information session for employers to educate on the value of regulated dental technologists and the available pathways to registration. 5. Hosting an information session for international educated and trained newcomers interested in the dental technology profession.
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6. Changes to registration practices

During the January 1 to December 31, 2025 reporting period, College of DENTAL TECHNOLOGISTS 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
Timelines for registration, decisions and/or responses	No	

Changes to internal review or appeal process	No	
Assessment of qualifications, including competency-based assessments and examinations	Yes	In 2025 the College eliminated the registration requirement for GBC students who successfully complete the GBC Jurisprudence Ethics and Professionalism Course to challenge the CDTO J&E exam.
Registration requirements either through regulation, by-law or policy	No	
Documentation requirements for registration	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Anti-racism and inclusion-based policies and practices	Yes	As part of advancing its equity, diversity, and inclusion work, CDTO is continuing to strengthen internal capacity by supporting staff in the responsible collection, interpretation, and use of sociodemographic data. The presentation emphasizes that this work is intended to inform more inclusive policies, outreach, and regulatory practices, while also requiring strong privacy protections, clear communication, and careful stewardship of sensitive information. In this context, staff learning and awareness are essential to ensuring that EDI principles are applied consistently, respectfully, and in a way that builds trust and supports fair, evidence-

		informed decision-making across the College. September 26, 2025 – 145th Board Package (PDF) https://cdto.ca/wp-content/uploads/145th-Board-Meeting-Public-Package-1.pdf — includes “Equity and Inclusion Data Collection” under the public agenda, it appears at page 152 of the package.
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C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third parties	No	
Mutual recognition agreements	No	
Accreditation of educational programs	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Steps to address labour issues (minister/stakeholders consultations, check demand-supply gap, etc)	Yes	With the expansion of CDCP coverage for dentures and the decline in number of registrants, the College is taking a proactive approach to addressing potential labour shortages of dental technologists. The steps taken are in the proposed amendments to its Registration Regulation to create new pathways for registration through PLAR and a Limited Class of Registration. In addition to expanding the registrant base, these changes aim to enhance accountability among

		unregulated professionals by ensuring they meet the College's standards for safe, competent, and ethical care.
Other	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)
Members	YES
Applicants	YES

Additional description:

In 2025, CDTO began collecting voluntary demographic information from applicants and registrants based on its Equity and Inclusion Data Strategy. The benchmark data was collected in the annual renewal cycle of September 1, 2025 to establish a baseline. The College is reviewing this data to determine how it can be meaningfully used and communicated. The information will help identify whether certain groups experience barriers in registration or other regulatory processes. Initially, the data will support outreach efforts. Over time, anonymized data from renewals, new registrations, and voluntary surveys will inform equity reviews, policy and process improvements, and decision-making to promote a more fair, accessible, and inclusive profession.

B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes

Additional description:

In 2025, CDTO began collecting voluntary identity-based data to better understand who is entering and moving through the profession. Review of this anonymized data helps identify patterns, including potential underrepresentation or barriers in registration and regulatory processes. The findings support equity and inclusion efforts such as policy and process review, improved outreach and communication, and identifying where additional applicant supports may be needed. The data also establishes a baseline, supports monitoring over time, and informs actions to promote fairness, transparency, and inclusion.

C. Languages of service provision

College of DENTAL TECHNOLOGISTS of Ontario makes application materials and information available to applicants in the following languages.

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

D. Membership Profile

Profession Name	Total Number of Members
Dental Technologist	475

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice Inactive (Non-Practicing)	454 21	133 5

Gender	Number of Members
Male	322
Female	137
X (includes trans, non-binary, and two-spirit people)	2
Other / not collected	14

Jurisdiction of Initial Training	Number of Members
Ontario	335
Other provinces and territories	5
United States	7
Other International	128
Multiple Jurisdictions	0
Other/not collected	0

Country of Initial Training	Number of Members
Argentina	1
Bosnia and Herzegovina	2
Bulgaria	5
Canada	340
China	2
Croatia	2
Ecuador	1

Egypt	3
Fiji	1
Germany	6
Greece	1
Hong Kong	2
Hungary	2
India	1
Indonesia	1
Iran	3
Iraq	1
Israel	5
Japan	1
Jordan	3
Kazakhstan	1
Latvia	1
Lebanon	7
Moldova	1
Philippines	3
Poland	12
Romania	9
Russia	4
Serbia	8
Slovenia	1
South Africa	6
South Korea	16
Syria	5
Turkiye	1
United Kingdom	9
Ukraine	1
United States of America	7

Official language of preference	Number of Members
English	475
French	0

Racial identity (optional)	Number of Members
Black	2
East / Southeast Asian	77
Indigenous	0
Latin American	8
Middle Eastern	39
South Asian	3
White	189
Other	5
Not collected	152

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Dental Technologist	6

Gender	Number of Applicants
Male	4
Female	2
X (includes trans, non-binary, and two-spirit people)	0
Other / not collected	0

Jurisdiction of Initial Training	Number of Applicants
Ontario	3
Other International	3

Country of Initial Training	Number of Applicants
Canada	3
Bulgaria	1
Syria	1
United Kingdom	1

Official language of preference	Number of Applicants
English	6

Racial identity (optional)	Number of Applicants
East / Southeast Asian	1
Middle Eastern	1
White	3
Not collected	1

G. Data Notes

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H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2025. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	3		
Other International	3		

Applications with decisions pending

The table below summarizes the inventory of applications in progress as of December 31, 2025. Again, some of these applications may have been received in the previous year.

Jurisdiction of initial training	Incomplete	Complete	Total
Ontario		3	
Other International		3	

I. New Registrants

For the 2025 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	6	3

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

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

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
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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

L. Data Notes

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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.