

## Item 9.1 Addendum to Appendix 1

Royal College of  
Dental Surgeons of Ontario

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April 26, 2023

SENT VIA EMAIL: [jrigby@cdto.ca](mailto:jrigby@cdto.ca)

Judy Rigby  
Registrar and CEO, College of Dental Technologists of Ontario  
305 Milner Avenue, Suite 904  
Scarborough, ON M1B 3VA

Dear Ms. Rigby:

### **Re: CDTO Proposed Registration Regulation Amendments**

I am writing on behalf of the Royal College of Dental Surgeons of Ontario (RCDSO) with feedback on the College of Dental Technologists of Ontario's (CDTO) proposed regulation amendment.

The RCDSO understands that the Ontario government is requiring all health regulatory colleges to create an Emergency Class of Registration to increase human resource capacity in healthcare, and to reduce registration barriers. The RCDSO further understands that the CDTO is proposing to create a new, limited class of license, in addition to the emergency class, to increase access to care and support labour mobility within Canada. The RCDSO supports these regulatory amendments and believes the development of these classes of license are in the public interest as it will ensure regulatory oversight of currently unregistered lab technicians.

In respect of the introduction of the limited class of license, in our understanding, the proposed amendments would enable currently unregulated dental lab workers to gain entry to the profession on a limited basis under supervision of Registered Dental Technologists (RDTs). The RCDSO assumes that the reason for inclusion of a supervisory requirement is because limited class applicants would not be required to have completed formal education in dental technology. If we are not correct in this assumption, we are seeking clarification on the rationale for requiring supervision of registrants in this class.

If the supervision of registrants in the limited class is required, the RCDSO encourages the CDTO to widen the scope of who can supervise limited class registrants to include dentists. As you know, dental labs are and can be located in dental offices in Ontario. Dentists already supervise these operations within the standards set by the CDTO. In addition, the CDTO's draft regulation proposes that applicants to the limited class can use experience working under the supervision of a dentist to qualify for registration. The RCDSO sees no reason why dentists should not continue to supervise these registrants once they obtain a limited license.

April 26, 2023

Judy Rigby

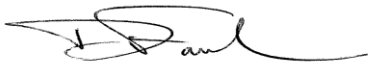
Re: CDTO Proposed Registration Regulation Amendments

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The RCDSO has no further comments on the CDTO's regulation amendment to include an emergency class of registration.

Thank you for the opportunity to provide feedback. Please feel free to contact me with any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Faulkner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel Faulkner, HBS., MBA

Registrar and CEO

(Direct line: 416-934-5615)



April 21, 2023

## By E-mail

The Ministry of Health  
Health Workforce Regulatory Oversight Branch  
Nursing and Professional Practice Division  
438 University Avenue, 10th Floor  
Toronto ON M5G 2K8

To Whom It May Concern:

### **Re: College of Dental Technologists of Ontario, Creation of Emergency Class Certificate of Registration**

The College of Nurses of Ontario (CNO) is grateful for the opportunity to provide feedback on the Dental Technologists of Ontario's draft Emergency Class regulations. In particular, we are providing feedback related to section 23.

A valid, reliable and secure entry examination supports safe practice. As regulators, we are accountable for ensuring that only those who demonstrate the competence can practice autonomously as practitioners (i.e. to transition to the general class). The entry exam is an objective assessment, assessing in a standardized way whether an individual will have the knowledge, skill and judgement to practice safely.

Literature links an entry examination to patient safety. For example, studies have investigated the correlation between national registration exam performance and patient safety<sup>1</sup>. Studies show those who score lower on the exam are at greater risk of providing

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<sup>1</sup> Cuddy, M.M., Young, A., Gelman, A., Swanson, D., Johnson, D.A., Dillon, G.F., & Clauser, B.E. (2017). Exploring the relationships between USMLE performance and disciplinary action in practice: A validity study of score inferences from a licensure examination. *Academic Medicine*, 92(12), 1780-1785. DOI: 10.1097/ACM.0000000000001747; Kinney, C.L., Raddatz, M.M., Sliwa, J.A., Clark, G.S., & Robinson, L.R. (2019). Does performance on the American Board of Physical Medicine and Rehabilitation initial certification examinations predict future physician disciplinary actions? *American Journal of Physical Medicine & Rehabilitation*, 98(12), 1079-1083. DOI: 10.1097/PHM.0000000000001250; Norcini, J., Boulet, J.R., Opalek, A., & Dauphinee, W.D. (2014). The relationship between licensing examination performance and the outcomes of care by international medical school graduates. *Academic Medicine*, 89(8), 1157-62. doi: 10.1097/ACM.0000000000000310; Tamblyn, R., Abrahamowicz, M., Dauphinee, D., Wenghofer, E., Jacques, A., Klass, D., Smee, S., Blackmore, D., Winslade, N., Girard, N., Du Berger, R., Bartman, I., Buckeridge, D. L., & Hanley, J. A. (2007). Physician scores on a national clinical skills examination as predictors of complaints to medical regulatory authorities. *JAMA*, 298(9), 993-1001. <https://doi.org/10.1001/jama.298.9.993>; Wenghofer, E., Klass, D., Abrahamowicz, M., Dauphinee, D., Jacques, A., Smee, S., Blackmore, D., Winslade, N., Reidel, K., Bartman, I. & Tamblyn, R. (2009). Doctor scores on national qualifying examinations predict quality of care in future practice. *Medical Education*, 43(12), 1166-1173. <https://doi.org/10.1111/j.1365-2923.2009.03534.x>

an unacceptable quality of patient care. For example, they are subject to higher rates of complaints and reports with disciplinary action taken. This speaks to the importance of this objective registration requirement with respect to safe patient care.

Demonstrating competence through a standardized examination before practicing autonomously is important to patient safety. Thus, we recommend amending section 23 in the draft regulation and not waive the examination requirement.

Thank you again for the opportunity to provide input. Should you require further information, or if you wish to discuss our recommendation, please contact Anne Marie Shin, Director of Professional Practice at [ashin@cnomail.org](mailto:ashin@cnomail.org).

Sincerely,

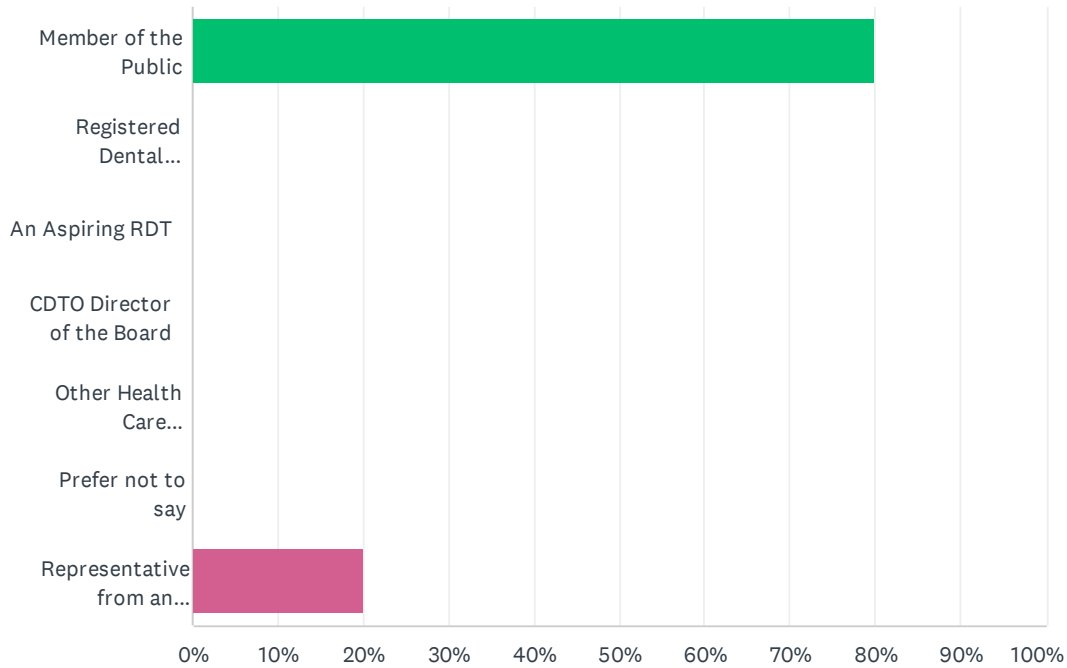
Silvie Crawford, RN, BHScN, LLM-Health Law  
Executive Director and CEO

/et

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### Q1 Are you a:

Answered: 5 Skipped: 1

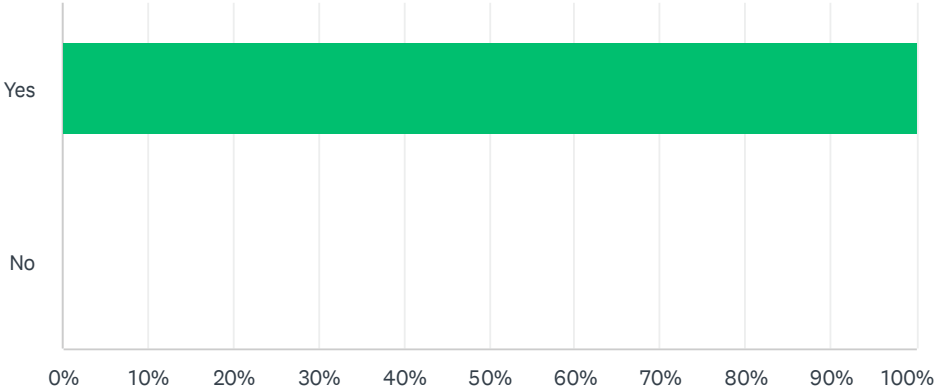


ANSWER CHOICES	RESPONSES	
Member of the Public	80.00%	4
Registered Dental Technologist (RDT)	0.00%	0
An Aspiring RDT	0.00%	0
CDTO Director of the Board	0.00%	0
Other Health Care Professional	0.00%	0
Prefer not to say	0.00%	0
Representative from an Organization	20.00%	1
Total Respondents: 5		

#	REPRESENTATIVE FROM AN ORGANIZATION	DATE
1	N/A	4/23/2023 2:49 PM
2	Member of the Citizen Advisory Group for the College of Physicians and Surgeons of Ontario	4/23/2023 1:02 PM

## Q2 Have you reviewed the public interest rationale in the consultation document (comparison table)?

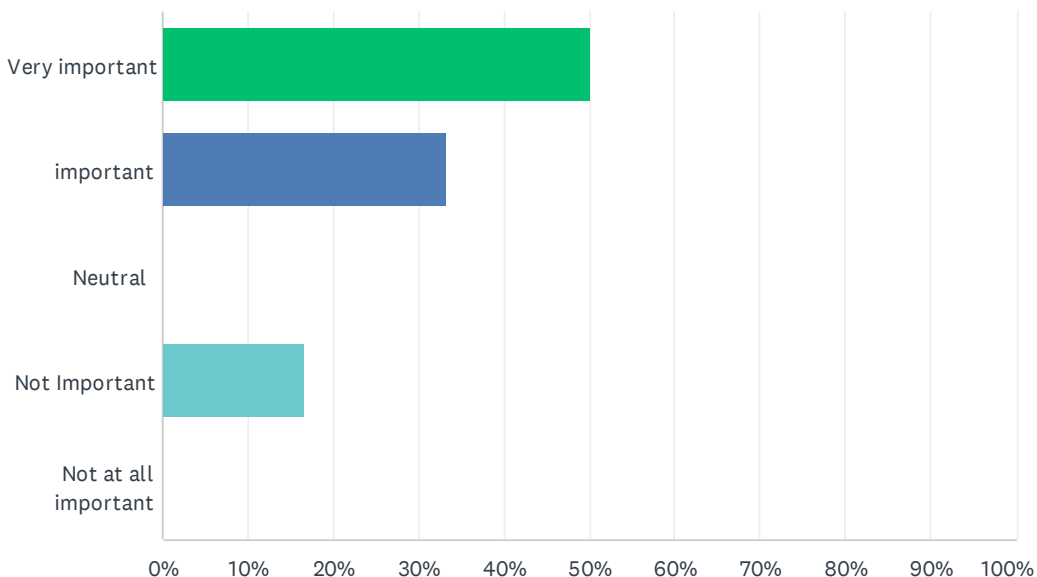
Answered: 6 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	100.00%	6
No	0.00%	0
TOTAL		6

### Q3 In your opinion, how important is creating the Limited Class for Ontarians (e.g., increasing human resource capacity prior to emergencies, increasing access to dental technology services, increasing accountability, and improving access to care)?

Answered: 6 Skipped: 0



ANSWER CHOICES	RESPONSES
Very important	50.00% 3
important	33.33% 2
Neutral	0.00% 0
Not Important	16.67% 1
Not at all important	0.00% 0
<b>TOTAL</b>	<b>6</b>

#	WHY?	DATE
1	It is important to create a Limited Class not only prior to emergencies but also have the Limited Class,operational after the emergency subsides. In some cases,the emergency may effect the provider with adequate care as the professional may be directly invilved in or affected personally by the emergency,whatever the emergency. In some events,the client may require immediate care. With a Limited Class designation,this permits the client to receive care without delay,in a safe and professional manner.	4/23/2023 2:49 PM
2	This would provide more access for dental care to the population and make use of those individuals who are qualified to practise in a given specific technique in which the practitioner is competent.	4/23/2023 1:02 PM
3	Appears that this would help provide services in rural or under represented areas.	4/19/2023 2:01 PM
4	To increase access to care to all.	4/18/2023 6:44 PM





**Q4 Do you believe that the safeguards being proposed are sufficient for Limited Class to practice independently and ensure public protection in the delivery of high-quality safe dental technology services? If not, please explain what else the College should consider.**

Answered: 6 Skipped: 0

ANSWER CHOICES	RESPONSES
Yes, please explain	100.00% 6
No, please explain	0.00% 0

#	YES, PLEASE EXPLAIN	DATE
1	Yes	4/23/2023 4:39 PM
2	Yes, My answer is contained in your paragraph. Ensures public protection and high -quality and safe services.	4/23/2023 2:49 PM
3	If these individuals have received the proper training and have access to supervision, I believe that this would be a step in the right direction for the citizens of Ontario to gain access to a service that they need. It would also increase the number of individuals who would be available to offer such services.	4/23/2023 1:02 PM
4	These safeguards seem reasonable and appear to ensure that the practitioner has the skills and knowledge required to provide safe dental technology services	4/19/2023 2:01 PM
5	Informed consent by patient might be considered.	4/18/2023 6:44 PM
6	Because people will also be held accountable.	4/15/2023 8:06 PM
#	NO, PLEASE EXPLAIN	DATE
	There are no responses.	

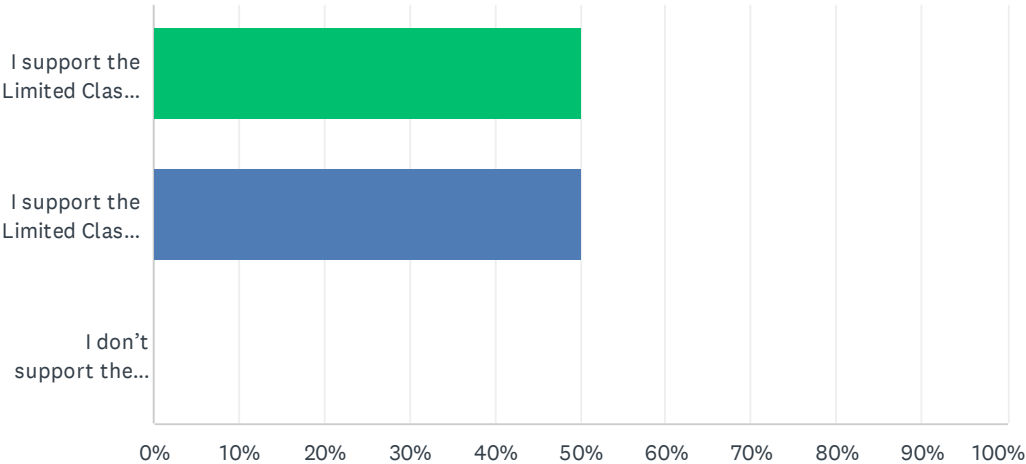
## Q5 In your opinion, are there any risks of harm associated with this class that the College should consider?

Answered: 6 Skipped: 0

#	RESPONSES	DATE
1	No	4/23/2023 4:39 PM
2	I believe that there is always risks involved in any health care procedure.With the College being informed and being able to act fast if required,makes this Limited Class,the same as any others.	4/23/2023 2:49 PM
3	I do not see a problem if these individuals are practising within the scope of their knowledge and expertise.	4/23/2023 1:02 PM
4	There's probably always a risk whether general or limited class in their performance	4/19/2023 2:01 PM
5	In situations of unusual or unexpected discovery work where supervision or consultation by a more experienced or more qualified RDT is not possible.	4/18/2023 6:44 PM
6	As long as there is human nature involved, there will always be risks of programs being abused.	4/15/2023 8:06 PM

# Q6 Do you support the addition of the Limited Class of Registration?

Answered: 6 Skipped: 0



ANSWER CHOICES	RESPONSES	
I support the Limited Class without supervision requirements	50.00%	3
I support the Limited Class with supervision requirements	50.00%	3
I don't support the Limited Class at all	0.00%	0
TOTAL		6

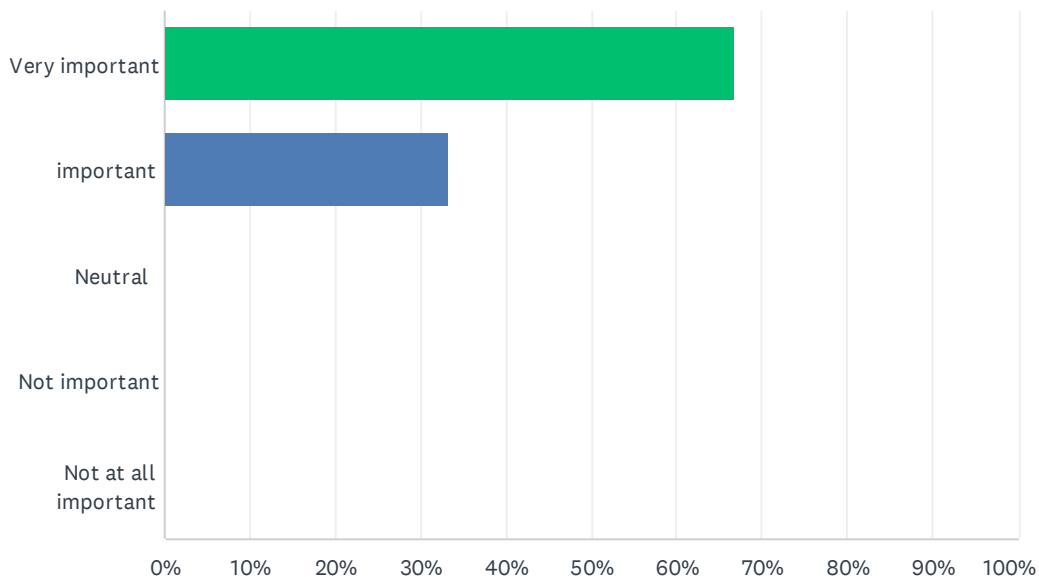
## Q7 Do you have any additional comments? All feedback will be reviewed carefully and used to help evaluate the draft.

Answered: 4 Skipped: 2

#	RESPONSES	DATE
1	No	4/23/2023 2:49 PM
2	I applaud these efforts in an attempt to allow more Ontarians to obtain such services in a timely fashion.	4/23/2023 1:02 PM
3	Seems reasonable to allow more people who are qualified but haven't completed all disciplines to perform services when needed in an emergency	4/19/2023 2:01 PM
4	Limited Class with supervision requirement even if supervision is remote or virtual.	4/18/2023 6:44 PM

## Q8 In your opinion, how important is creating the PLAR pathway for Ontarians?

Answered: 6 Skipped: 0



ANSWER CHOICES	RESPONSES
Very important	66.67% 4
important	33.33% 2
Neutral	0.00% 0
Not important	0.00% 0
Not at all important	0.00% 0
<b>TOTAL</b>	<b>6</b>

#	WHY?	DATE
1	Basically,cuts back on waiting time. My also service non-urban areas.ie.,small towns and villages in remote areaa.	4/23/2023 2:49 PM
2	This would provide individuals who have these skills to be fast-tracked for practise in their field of expertise and skill set. Many immigrants to Canada already possess these skills; yet, to date, these individuals are working in jobs that undervalue their knowledge when their skills and knowledge could be put to good use. Many of these individuals are working in low paying jobs and that has to be very difficult to deal with. In the meantime, the residents of Ontario are waiting much longer than need be to obtain such services.	4/23/2023 1:02 PM
3	If there is a need for dental lab workers and there are not enough of them to fill positions, then this seems like a reasonable way to give eligible people the opportunity to work in their field of knowledge. On the job training is often the best way to learn.	4/19/2023 2:01 PM
4	Where there are shortages and limited access to RDTs.	4/18/2023 6:44 PM
5	It provides increased chances for proper certification and with that job security.	4/15/2023 8:06 PM

## Q9 In your opinion, are there any risks associated with creating this pathway that the College should consider?

Answered: 6 Skipped: 0

#	RESPONSES	DATE
1	No	4/23/2023 4:39 PM
2	Maybe not the same quality education or supervision of their hands-on training experience.	4/23/2023 2:49 PM
3	Not in my humble opinion. I applaud these new initiatives!!!	4/23/2023 1:02 PM
4	Just making sure that people seeking this pathway are truly eligible and have the background skills and knowledge required.	4/19/2023 2:01 PM
5	Efficient review of qualifications to this fast tracking may be difficult to invigilate accurately. Is there enough staff to ensure the new emergency RDTs are qualified?	4/18/2023 6:44 PM
6	One does not really get the complete picture of an applicant's qualifications.	4/15/2023 8:06 PM

## Q10 Do you support the addition of the PLAR pathway?

Answered: 6 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes, please explain	100.00%	6
No, please explain	0.00%	0

#	YES, PLEASE EXPLAIN	DATE
1	Yes	4/23/2023 4:39 PM
2	Myis a yes and no answer.I would support a PLAR,but have tougher questions and practical skills test for certification	4/23/2023 2:49 PM
3	Most definitely! If other disciplines have proven that this approach works, it is worthwhile going ahead with this initiative.	4/23/2023 1:02 PM
4	Often people from outside the country have a difficult time acquiring the licenses needed. This gives those with prior background knowledge the opportunity to meet Ontario's regulations.	4/19/2023 2:01 PM
5	If patient welfare is the utmost priority to protect the patient from harm.	4/18/2023 6:44 PM
6	Again - it will allow more qulifpeople to become certified	4/15/2023 8:06 PM
#	NO, PLEASE EXPLAIN	DATE
	There are no responses.	

## Q11 Do you have any additional comments? All feedback will be reviewed carefully and used to help evaluate the draft.

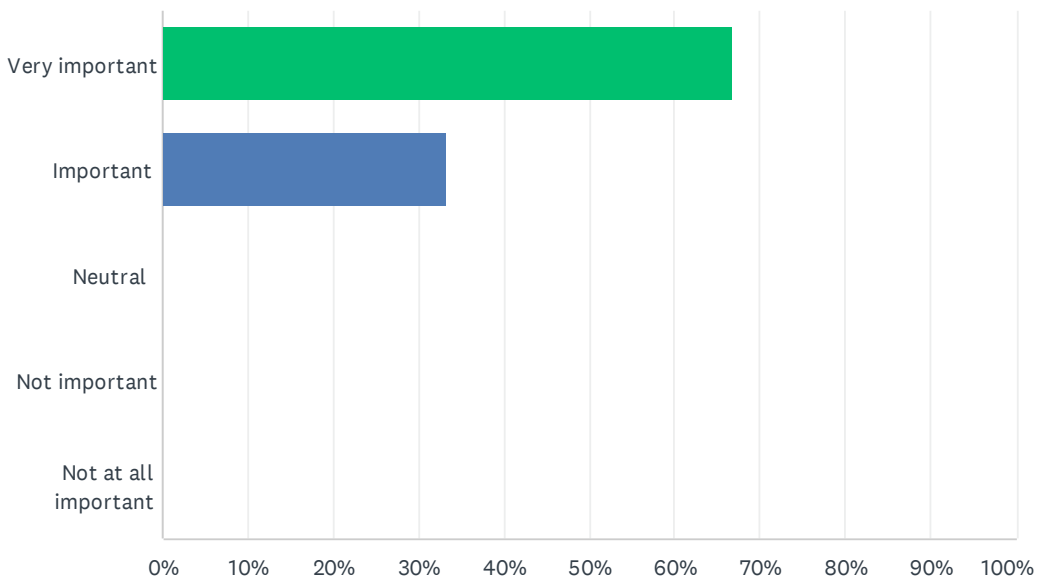
Answered: 4 Skipped: 2

#	RESPONSES	DATE
1	No	4/23/2023 2:49 PM
2	Not at this moment. I feel that your college is on the right track to enhance the quality of the services offered and in increasing the timeliness of such care.	4/23/2023 1:02 PM
3	None	4/19/2023 2:01 PM
4	No.	4/18/2023 6:44 PM



## Q12 In your opinion, how important is creating the Emergency Class for Ontarians?

Answered: 6 Skipped: 0



ANSWER CHOICES	RESPONSES
Very important	66.67% 4
Important	33.33% 2
Neutral	0.00% 0
Not important	0.00% 0
Not at all important	0.00% 0
<b>TOTAL</b>	<b>6</b>

#	WHY?	DATE
1	In case of another pandemic, a strategy is very important	4/23/2023 4:39 PM
2	Lack of skilled,professional,healthy(burnout),members.	4/23/2023 2:49 PM
3	It would be helpful for the patients to have access to information about the emergency class. I would like to suggest that more information should be provided about what constitutes an emergency. There is mention about the pandemic; however, it would be helpful to provide other examples.	4/23/2023 1:02 PM
4	If there are additional needs for extra people in this field then every opportunity should be created to fill these needs.	4/19/2023 2:01 PM
5	To ensure timely, safe RDT access to all Ontarians.	4/18/2023 6:44 PM

## Q13 In your opinion, are there any risks of harm associated with this class that the College should consider?

Answered: 6 Skipped: 0

#	RESPONSES	DATE
1	No	4/23/2023 4:39 PM
2	Not any more than any other health care profession.	4/23/2023 2:49 PM
3	I do not see a problem as long as the individual is working under the supervision of a dentist or dental technologist who meets all of the requirements and is a registered member.	4/23/2023 1:02 PM
4	Not being in the profession myself, the only thing I can think of is if people are admitted to that class of practice that don't have the required qualifications. As long as all safe guards are in place to ensure that people with the right eligibility qualifications can acquire the certification, then I don't see a problem	4/19/2023 2:01 PM
5	Qualifications for certificate of registration need to scrutinized and reviewed as necessary.	4/18/2023 6:44 PM
6	No	4/15/2023 8:06 PM

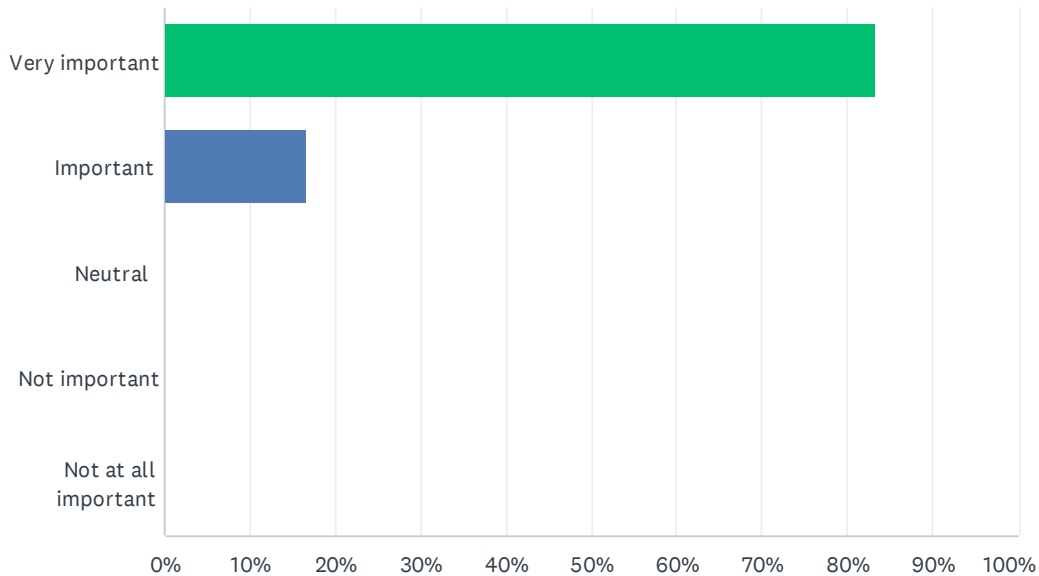
**Q14 Do you have any additional comments? All feedback will be reviewed carefully and used to help evaluate the draft.**

Answered: 4 Skipped: 2

#	RESPONSES	DATE
1	No	4/23/2023 2:49 PM
2	Nothing that I can think of at the moment.	4/23/2023 1:02 PM
3	no	4/19/2023 2:01 PM
4	No.	4/18/2023 6:44 PM

### Q15 Considering fair registration practices, how important is creating a pathway to transfer from the Emergency Class, which is a temporary class, to another class of registration?

Answered: 6 Skipped: 0



ANSWER CHOICES	RESPONSES
Very important	83.33% 5
Important	16.67% 1
Neutral	0.00% 0
Not important	0.00% 0
Not at all important	0.00% 0
<b>TOTAL</b>	<b>6</b>

#	WHY?	DATE
1	This would enable individuals who have obtained a temporary certificate to move onto a more permanent personal career situation and be able to carry out the duties and role for which they have the required training and also have the option of taking further courses to reach their ultimate goal of becoming a full-time dental technologist who can work on his or her own.	4/23/2023 1:02 PM
2	These requirements appear to be all encompassing and clearly outline what steps are needed to attain another class of registration.	4/19/2023 2:01 PM
3	To address shortages of RDTs in order to provide timely, safe access for all Ontarians.	4/18/2023 6:44 PM
4	Nobody shall gain unfair advantages due to their circumstances.	4/15/2023 8:06 PM

## Q16 In your opinion, are there any risks of harm associated with this transfer that the College should consider?

Answered: 6 Skipped: 0

#	RESPONSES	DATE
1	No	4/23/2023 4:39 PM
2	I believe exempted the practical examination must not be exempt. Reason:-I would like to see how the student performs in both uncomfotable and stressful scenarios.	4/23/2023 2:49 PM
3	None that I can identify at the moment!	4/23/2023 1:02 PM
4	no	4/19/2023 2:01 PM
5	Less experience in the field for these new Emergency RDTs.	4/18/2023 6:44 PM
6	Strict evaluation is necessary.	4/15/2023 8:06 PM

## Q17 Do you have any additional comments? All feedback will be reviewed carefully and used to help evaluate the draft.

Answered: 4 Skipped: 2

#	RESPONSES	DATE
1	No	4/23/2023 2:49 PM
2	No further comments. I believe that overall, the proposed changes have been well thought out and will contribute to an improved service to all Ontarians. Job well done to all who were involved in this process!!!	4/23/2023 1:02 PM
3	no	4/19/2023 2:01 PM
4	None.	4/18/2023 6:44 PM