



College of Dental Technologists of Ontario

Ordre des technologues dentaires de l'Ontario

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December 1, 2014

By E-mail

The Honourable Dr. Eric Hoskins
Minister of Health and Long-Term Care
Corporate Management Branch
10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, ON M7A 2C4

Dear Minister,

Why We Believe in This

The Council of the College of Dental Technologists of Ontario (the “College” or the “CDTO”) is fully committed in its role to provide leadership under the Regulated Health Professions Act, 1991 (the “RHPA”) to protect all Ontarians who require the services provided by dental technologists practising in Ontario, and to act in their best interest. The CDTO understands that self-regulation is a privilege granted to the profession of dental technology and through its mission and core values puts the interests of the public ahead of its members’ professional interests.

Your letter dated October 4th is timely in that it has provided us with an opportunity to pause, reflect on and evaluate our efforts and achievements to: deliver excellence through leadership, accountability and trust; ensure our approach is grounded by core values that form high standards of performance; and ensure that College staff and Council are providing high quality services to our audiences, which include the public, members, applicants, government, and stakeholders.

We wholeheartedly support your efforts to ensure that “all Ontarians have access to information that is relevant and timely, useful and accurate...information that evokes public confidence and enhances the public’s ability to make informed decisions about their care”, through transparency.

Transparency is One of Our Core Values

At the CDTO transparency is one of five core values that underlies all programs, decision-making processes and information disclosure to enable our audiences to: understand the role of a regulatory College; make better choices about their care; and receive information about the type and quality of care they might expect and who will provide it to them. The College makes every effort to ensure that all of our core values, including integrity, respect and consideration, transparency and openness, communication and accountability are built into every facet of our operations and guide the behaviour of our Council, staff and members. We are committed to ensuring that transparency is a priority objective.

The CDTO is and will continue to be informed by best practices for transparency in our programs, decision-making processes and information disclosure, established by our esteemed colleagues at all of Ontario's health care regulatory colleges. We support and acknowledge the fine work of the Advisory Group for Regulatory Excellence ("AGRE") in identifying transparency as a significant regulatory issue, undertaking considerable analysis to strengthen current regulatory mechanisms, and making policy recommendations which will strengthen public confidence in self-regulation. The College also commends the Federation of Health Regulatory Colleges of Ontario ("FHRCO") for making information-sharing on the principled and consistent approach to transparency established by AGRE, a priority to all colleges sharing the same mandate.

At the CDTO transparency is integral to everything we do and how we do it. This letter will highlight the transparency measures the CDTO has in place today and the work we plan to start in the next twelve months to strengthen, enhance and increase transparency in the areas of our public register, communications, governance, registration, regulatory processes, professional practice and public awareness.

We Support the Eight Transparency Principles Articulated by AGRE

The Executive Committee has endorsed the Transparency Principles created by AGRE to guide future decisions about publicly-available information and which demonstrate openness to transparency and our commitment to the public interest. The eight principles will be posted on the CDTO website for member, public and other stakeholder consultation in December 2014, with the expectation that Council will discuss the principles at the first Council meeting to be held in 2015.

By way of overview, the Transparency Principles are:

1. The public needs access to appropriate information in order to trust that this system of self-regulation works effectively.
2. Providing more information to the public has benefits, including improved patient choice and increased accountability for regulators.
3. This information needs to be relevant, credible and accurate.
4. In order for information to be helpful to the public, it must: be timely, easy to find and understandable; and include context and explanation.

5. Certain regulatory processes intended to improve competence may lead to better outcomes for the public if they happen confidentially.
6. Transparency discussions should balance the principles of public protection and accountability, with fairness and privacy.
7. The greater the potential risk to the public, the more important transparency becomes.
8. Information available from Colleges about members and processes should be similar.

To a large extent, the College has already adopted and implemented these principles. They have always been the foundation of all transparency initiatives at the College. We are re-affirming them now.

We are Looking at Ways to Include More Information on the Public Register

The College maintains a register of practising and non-practising dental technologists in accordance with the minimum requirements stipulated in section 23(2) of the Health Professions Procedural Code. The College is already reviewing its public register to ensure that all this information can be easily found. The Public Register is accessible on the College's website and allows users to search for dental technologists by surname, city or postal code.

We expect to begin a benchmarking study within the next few months to identify categories of information, in addition to the Phase 1 and Phase 2 categories presented by AGRE, that are considered a moderate to high risk outcome for the public. These recommendations will be presented to the Executive Committee and Council for consideration along with proposed by-law amendments to be circulated to the members and other stakeholders for consultation and feedback. The proposed changes will also be available on the College's website so that members of the public may provide comments.

Making Information on Our Website Clear to Everyone

The website is the College's main communications vehicle which contains information for our members, the public and other stakeholders. All information relating to its mandate, regulatory duties of the College, mission, vision, and core values is available to all website users. In addition, an explanation of the role of the Council and Statutory/Standing Committees, including terms of reference, and information targeted to applicants, members and the general public are provided by program area and decision-making processes. A section on the website also provides all users the "Myths and Facts" which helps to clarify the role of the College and distinguishes the separate functions/duties of the professional association and the regulator.

Other College publications such as the Annual Report, a newsletter titled the "Advisor", and brochures are also available on the website. The College provides its applicants and members with various documents in soft and hard copy that are necessary for registration, quality assurance and inquiries and complaints programs and decision-making processes.

We are keenly aware that any information provided on our website must be clear, informative, useful, relevant, accurate, timely, easy to retrieve, read and print and, to the extent possible, available to our audiences in both English and French.

To this end, the Executive Committee has already endorsed in principle a website usability review which, if approved by Council, could be conducted by an external consultant early next year. The College is also engaged in an ongoing document review to ensure all forms and guidelines are user-friendly and meet transparency requirements. In the short-term, the goal is to make all forms and guidelines available on the website for users to retrieve and provide additional publications (such as the Report of the Office of the Fairness Commissioner and the College's Action Plan). In the long-term, the goal is to provide users with an online form submission for registration, quality assurance (professional development profile submissions) and decision-making (examination appeals and complaints).

We Let Everyone Know What We Are Doing

The Council of the CDTO is committed to transparency in the way it performs its duties and responsibilities to protect the public and the public's interests and expects the same from its Committees and College staff. All Council meetings are open to members, the public and key stakeholders. Council meeting dates are posted on the website to provide reasonable notice of all meetings and changes that occur from time to time. The College is always considering additional ways to make information discussed at Council meetings available to the public, members and other stakeholders. For example, the College is exploring the option of posting the agenda for Council meetings on its website, providing a meeting package for all confirmed attendees and, where a meeting is to be held by teleconference, posting on its website to all interested parties who contact the College with call-in information.

We are "Open for Business" Even When Council is Not Constituted

Over the last three (3) years a significant challenge for the College has been to continue functioning at a very high level despite the lack publicly-appointed members. We have done so.

In situations where there is risk of harm to the public, specifically where deficiencies are identified through a complaint or as part of a quality assurance or peer review assessment, the Registrar, under s.75(2) of the Code, is able to appoint an investigator, report to authorities, legal counsel and put together a report for the Investigations, Complaints and Reports Committee. Also, under s. 12(1) of the Code:

Between the meetings of the Council, the Executive Committee has all the powers of the Council with respect to any matter that, in the Committee's opinion, requires immediate attention, other than the power to make, amend or revoke a regulation or by-law.

The College has been working closely with both the Public Appointments Secretariat and the Ministry to minimize any disruptions.

We Have Been Reviewing All of Our Processes

Recently, Council and its Committees conducted an internal review of the College by-laws and policies, as well the application and examination process, approach to professional practice, and continuing education and professional development programs. In 2014, proposed amendments to the by-laws were circulated to members and posted to the College website for all users with an invitation for feedback. Council approved a "Good Character" policy and the College's Registration Committee has endorsed in principle revisions to the Examinations Appeal and Accommodations policies.

Another enhancement to an existing measure is that any matter for discussion or decision is brought to Council through a briefing note. The briefing note must consider financial and human resource implications and how it aligns with the College's strategic priorities – including transparency.

Through this process (and responding to your inquiries) we are learning about other potential ways that we can include greater transparency into our processes.

We are Investing in Training

To enhance Council's understanding of and its effectiveness in the areas of risk management, governance, strategic planning, regulations, by-laws and policy development, the College is working on engaging external consultant(s) and legal counsel to provide a comprehensive training about its processes in 2015.

Our Registration Processes Have Been Praised by the Office of the Fairness Commissioner

As with all regulators, our registration practices and processes are reviewed annually by the Office of the Fairness Commissioner (the "OFC"). In the 2014 assesment report published by the OFC, the CDTO was commended on going above and beyond the minimum standards set by the OFC assessment guides to provide clearer and more comprehensive information about the registration process in its entirety. It is a "one-stop-shop" for providing a roadmap to membership. Information is provided in a clear and easily accesible manner in a process flowchart and is enhanced by an applicant checklist, career map, fee schedule, forms and guides, and appeal processes that applicants may need to access.

The College collaborated with regulators from across the country to develop a Canadian Competency Profile for Dental Technologists. It provides a benchmark for assessing applicant qualifications to determine eligibility to write entry-to-practice examinations.

Our communications with applicants is very important to us. We will continue to enhance our current measures by:

1. Posting the annual registration practices assessment report and our action plan in response to the recommendations on our website;
2. Reviewing the Canadian Competency Profile for Dental Technologists to ensure currency with recent changes in technology;
3. Provide in class registration information sessions to graduating students at George Brown College; and
4. Continually review all forms and documentation for clarity, accesibility and understandibility.

The College is considering new transparency initiatives in the area of registration and assesment practices such as:

1. Expanding the website to support on-line applications where all applicants will be able to apply on line and self-monitor the status of their applications; and
2. Survey all new members, including international applicants, about the application process and utilise their feedback to support continuous improvement in transparency.

We are Making it Easier to Make Our Audiences Heard Through the Complaints Process

The CDTO has a very low volume of complaints. But we still take every opportunity to ensure that the complaint process is accessible, transparent and fair.

The College's complaints process provides members of the public with a way to share concerns about the practice of dental technology with the College. Our website clearly addresses how to make a complaint and the steps which will be taken by the College when a complaint is received and what a member of the public can expect when they do complain. Details of the roles of the complainant, the dental technologist, the Registrar and the various committees the matter may be referred to, including the Investigation, Complaints and Reports, Discipline, Fitness to Practice and Executive Committees, are also available on the website and in a complaints brochure "Complaints Process Brochure". The timelines associated with the complaint and appeal processes are provided.

The College is not resting on its laurels. We are always re-assessing and trying to make things easier to understand, reduce barriers and our website easier to use. For example, we are discussing launching an awareness campaign designed for all stakeholders, including members of the public, "bench-workers", other health care professionals, other dental technologists and government agencies, who have a concern about a dental technologist. We are also looking into ways to better assist complainants who have a disability and require accommodation. For example, we are exploring the possibility of a new online submission form for complaints on the website to further reduce barriers and make our processes even more accessible. We are also exploring ways to better process complaints received in a language other than English or French.

We are Reviewing our Standards of Professional Practice to Ensure that they are Current

All of our practice standards and guidelines are available on the College's website. They reflect core competencies for the practice of dental technology and form the foundation on which we set the expectations for our members with respect to their knowledge, skills and judgment. They also form the benchmark for assessing new applicant qualifications and are incorporated into our entry-to-practice examinations. Perhaps most importantly, they inform the public of what they can expect from a dental technologist. The CDTO is reviewing these standards and guidelines to ensure that they reflect current trends and technologies, promote the intended results, and are clear and easy for everyone to understand.

Clarifying Our Expectations About Professional Practice

As part of our commitment to transparency and to protect the public, the College is always looking for additional ways to clarify its expectations.

For example, earlier this year, the College posted a practice advisory on its website entitled, "Inactive Certificate of Registration". It sets out expressly that members who hold this type of certificate of registration cannot practice any form of dental technology in Ontario. The College issued this Advisory to clarify a misunderstanding amongst some members that engaging solely in "bench work" did not really amount to practising dental technology.

We are Looking for Additional Ways to Protect the Public

The College's mandate is to regulate the practice of dental technology in the public interest. Section 32 of the *RHPA* says that only dentists, dental technologists or people supervised by them can "design, construct, repair or alter a dental prosthetic, restorative or orthodontic device...". This means that unregulated members of the public can work on dental appliances (often known as "bench-workers") as long as they are appropriately supervised. Because many of these facilities are not regulated and include workers who may not be regulated either, the College is open to working with the Ministry to discuss making the regulation of dental technology more transparent. This could involve regulating these laboratories, developing an inspection program for them and making it clear to the public who is really making their dental appliances.

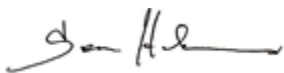
In the interim, the College continues to educate all health care professionals that an RDT's stamp is required on invoices and work orders. The RDT stamp is a symbol that a dental appliance has been inspected by a dental technologist, and that it has been fabricated according to professional standards.

We All Have the Same Goal

We share your passion to make sure that Ontarians have access to meaningful, timely and accurate information about their health care. Transparency implies openness, communication and accountability. It is one of our highest priorities. It forms part of everything that we do, ranging from opening up our own processes even further and doing more to raise public awareness and confidence.

We would be delighted to respond to questions or discuss what we are doing with you. Please contact Judy Rigby, Registrar and CEO.

Sincerely,



Sean Hanrahan, RDT
President



Judith (Judy) Rigby, CPA, CGA
Registrar and CEO

c: Suzanne McGurn, Health Human Resources Strategy Division
John Amodio, Director, Health Systems Labour Relations and Regulatory Policy Branch