



February 27, 2026

The Honourable Sylvia Jones, Minister of Health
College Park
777 Bay St, 5th Floor
Toronto, ON M7A 2J3

Transmitted by email: sylvia.jones@ontario.ca

Dear Minister Jones:

Re: Proposed Registration Regulation Amendments submitted on May 1, 2023

The College of Dental Technologists of Ontario (CDTO) is encouraged by the Ministry's ongoing efforts toward regulatory modernization, most recently reflected in the *Protecting Ontario Through Free Trade Within Canada Act*, specifically the expansion of the As of Right rules, and progress on scope of practice and registration regulation changes for oral health regulatory colleges.

Our Board has agreed that this is a timely opportunity to reaffirm how our proposed amendments to the Registration Regulation (O. Reg. 874/93) under the *Dental Technology Act, 1991*, submitted on May 1, 2023, align with these priorities. We hope that the information provided herein will support the Ministry's review and facilitate the timely approval of these proposed amendments.

Background

In 2023, when all health regulatory colleges were asked to update their registration regulations to include an emergency class of registration, CDTO took this opportunity to propose additional amendments aimed at further strengthening the registration framework. These proposed amendments are intended to streamline credential recognition, reduce registration barriers, enhance interprovincial labour mobility, improve access to care, and support health human resource capacity.

Ontario is experiencing a growing demand for oral health care, driven by an aging population and expanded access through the Canadian Dental Care Plan. At CDTO, we have seen a decline in the number of registered dental technologists who hold a General Class of registration and can supervise the profession. Today, there are only 452 registrants who can supervise more than 1,500 unregulated dental laboratory associates to meet the increased demand for dental technology services, creating a risk to public protection. CDTO's proposed amendments are designed to help prepare more professionals to meet this demand and to contribute to a more resilient workforce that is better equipped to respond to future health system challenges.

The following sections explain the major proposed amendments to the Registration Regulation and demonstrate how they align with the Ministry's regulatory modernization priorities, as well as the actions CDTO is already undertaking.



Proposed Amendment #1: Prior Learning Assessment and Recognition (PLAR) Credential Pathway

Currently, CDTO's Registration Regulation only recognizes two credentialing pathways to meet the requirements of registration:

- Completion of a formal approved dental technology program; or
- Completion of a formal dental technology program deemed equivalent to the approved dental technology program in Ontario.

Ontario has seen a decline in the number of graduates from its approved program at George Brown College seeking licensure. This could be due to provincial legislation that does not enforce mandatory registration of those competent to practice dental technology, like Alberta.

An environmental scan shows that a high number of unregulated dental laboratory associates have gained the knowledge and skills necessary to be credentialed through non-formal education or experiential learning. However, these individuals do not have a pathway to become registered.

PLAR provides a structured and evidence-based method to assess an applicant's knowledge and skills gained through non-formal education or experiential learning, offering an additional pathway for qualified individuals. This approach can support more flexible and inclusive registration practices while maintaining public protection. Under a PLAR pathway, eligible applicants would still be required to successfully complete the national knowledge and performance-based assessments, and specific provincial requirements to confirm that they are prepared to practise safely, competently, and ethically.

Proposed Amendment #2: Limited Class of Registration

Currently, CDTO's Registration Regulation recognizes only one practising class, requiring registrants to demonstrate competence across the full scope of dental technology, which comprises crowns and bridges, implants, full and partial dentures, and orthodontics. However, many individuals working in dental technology, whether independently or under supervision, practise in only some disciplines rather than across the full scope.

Dental technology services are delivered by a team of oral health care professionals collaborating to provide high-quality care. In dental laboratory settings, unregulated dental laboratory associates with appropriate qualifications and experience often perform specific aspects of practice under the direction of a registered dental technologist without requiring direct supervision at all times.

Introducing a Limited Class of Registration for supervised practice in one or more, but not all, disciplines of dental technology would help integrate 1,500 unregulated dental laboratory associates into the regulated system. This would ensure that individuals practise within defined competencies under the delegation of a registered dental technologist, adhere to CDTO's standards of practice and professional development requirements, and provide patients and clients with a process to seek accountability.



Moreover, regulating dental laboratory associates would strengthen the oral health care system by enabling registered dental technologists to focus their time and expertise on chairside collaboration with oral health professionals, educating teams on emerging dental technologies, and conducting shade matching with patients. This collaborative approach could improve access to care, particularly in remote or underserved communities where demand for specific dental technology services is high.

Steps CDTO Is Taking

CDTO continues to advance regulatory modernization by implementing changes, where possible, through policy and By-Laws. For example, a pro-rated fee structure to support new registrants was introduced on September 1, 2022. While our proposed amendments originally included making completion of the Jurisprudence Program a registration requirement, this change has since been implemented through policy, reflecting our commitment to regulatory efficiency and responsiveness. However, establishing a new class of registration and introducing an additional pathway to meet non-exemptible requirements can only be achieved through regulatory amendments.

PLAR Pathway

The work to develop a national PLAR is already well underway. The pilot launched in the spring of 2025, attracting 25 expressions of interest, and is expected to be completed and fully launched in the fall of 2026. CDTO, in collaboration with its national alliance, the Canadian Alliance of Dental Technology Regulators (CADTR), has already achieved a pan-Canadian credential and assessment services model to support provincial registration. Key accomplishments include a national education benchmark, entry-to-practice and essential competencies, and a harmonized approach to credential evaluation and competency assessment.

The PLAR pathway will enhance access and fairness for both domestically and internationally trained dental laboratory associates, while maintaining rigorous standards of competence and safety. This project is supported by \$686,747 in funding from the federal government's Foreign Credential Recognition Program for a 36-month initiative that began in January 2024, with an additional \$77,000 in funding approved in October 2025. Without the Ministry's approval, Ontario will not be able to adopt PLAR, a national harmonized standard that all other provinces that regulate dental technology currently accept.

Limited Class of Registration

Since 2004, a licensing model in which registrants demonstrate competency in a single discipline of dental technology has been successfully implemented in Alberta and is under consideration by other provincial regulators. At the national level, CADTR is developing a modular, ladder, performance-based assessment that evaluates candidates in individual disciplines without duplicating overlapping competencies. This approach not only supports the Limited Class licensing model but also allows individuals to build competency toward a full discipline, General Class of registration.



Looking Ahead

We commend the Ministry's commitment to reducing interprovincial trade barriers and ensuring access to care for Ontarians. Our proposed amendments advance single discipline dental technology practice and enable Ontario's participation in the national PLAR, aligning the province with emerging national standards.

The Ministry's current focus on modernizing scopes of practice to improve access and efficiency in health care delivery is well aligned with regulatory developments in other provinces. Expanded scope of practice can reduce patient travel time and costs, minimize redundant appointments, and promote more cost-effective, integrated, patient-centred care.

CDTO wants to highlight an example in Alberta's legislation, which authorizes Registered Dental Technologists and Registered Dental Technicians, following approved additional training, to perform the restricted act of fitting for the purposes of colour matching or determining preliminary fit. In Ontario, where this is a controlled act, permitting dental technologists to perform it could enhance professional versatility and streamline care delivery while maintaining patient safety.

We would welcome the opportunity to meet with Ministry staff to discuss next steps to support a timely review and approval of our proposed amendments, and to explore how scope of practice enhancements could align with broader health system and patient benefits.

Sincerely,

James Matera, RDT
Chair

Judith Rigby, CPA, CGA
Registrar and CEO

On behalf of the Board of Directors of the College of Dental Technologists of Ontario

cc: Allison Henry, Director