

College of PHYSICIANS AND SURGEONS of Ontario

2024 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

Content

1. Background
2. Organization information
3. Registration requirements
4. Third party assessments
5. Accomplishments, risks and mitigations
6. Changes to registration practices
7. Membership and application data

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, 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

Organization name	College of PHYSICIANS AND 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 College of PHYSICIANS AND SURGEONS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Physician
Academic requirement	Medical degree listed in WHO (Reg. 865/93), or MD that meets the requirements of the policy Alternatives

	to Degrees in Medicine, or Doctor of Osteopathic Medicine as outlined in D.O. Policy.
Experience requirement	Under the Ontario Regulation: Clerkship at accredited medical school in Canada, or 1-year postgraduate medical education or 1-year active medical practice. Physicians can be exempted from the above requirement under the One Year Canadian Practice Exemption Policy.
Language requirement	The CPSO does not require tests of language proficiency. However, we have posted on the website the testing that is acceptable to the CPSO.
Additional information on licensing requirements (may include links to appropriate page on regulator website):	

4. Third party assessments

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

Organization name	Function
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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 PHYSICIANS AND SURGEONS of Ontario takes the following measure(s) to ensure fair and timely assessments:

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Approved a new policy that increased routes to registration for a new cohort of internationally trained physicians.
2	Amended current registration policies to recognize training outside of Canada as equivalent and reduce barriers to physicians obtaining full, independent licenses.
3	Waived application fees for Ontario Residents engaged in Moonlighting to increase hospital staffing. Waived application fees for out-of-province electives in Ontario.

B. Risks and Mitigations

Risk	Mitigation Measure
The legislative framework presents challenges to licensing physicians due to narrow and historic criteria.	The CPSO has developed many regulatory policies that provide alternative routes to licensure in Ontario. Alternative routes either recognize international education and qualifications or providing an exemption to legislation. The CPSO also works with jurisdictions across Canada to ensure alignment in licensing routes where possible.

6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of PHYSICIANS AND 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	Yes	The Alternative Pathways to Registration for Physicians Trained in the United States policy was amended to reduce barriers to practice in Ontario for US-trained osteopathic physicians. In 2020 the American Osteopathic Association and American Association of Colleges of Osteopathic Medicine (AACOM) became member organizations of the Accreditation Council for Graduate Medical Education (ACGME). The policy was revised to accept ACGME-accredited osteopathic training, as well as AOA certification by examination. The revised policy expanded access to US-trained physicians while maintaining integrity of registration practices. The Pathways policy was amended again in Fall 2024. US-trained physicians licensed under Pathway A are granted a restricted certificate to practice independently in their scope. However, the revised policy enables these physicians to apply for an independent practice certificate after practice in Ontario continuously for 5 years. The changes provide clarity to the public and bring the CPSO in-line with FMRAC Model Standards. The Acceptable Qualifying Examinations (AQE) policy provides an alternative route to licensure for physicians who do not hold the Licentiate of the Medical

		<p>Council of Canada. The Comprehensive Osteopathic Licensing Examination (COMLEX – USA) is a 3-stage exam required to obtain a Doctor of Osteopathic Medicine degree. The policy was amended to reflect the discontinuation in 2022 of the COMLEX level 2 – Performance Evaluation. Changes provide transparency for registration requirements. In 2024, the Board approved a new route to registration for internationally trained physicians (ITPs). The Royal College of Physicians and Surgeons of Canada grant ITPs access to the RCPSC specialty exams through the Practice Eligibility Route (PER). Historically, physicians that have had their training and education evaluated by the RCPSC and granted exam eligibility under the PER route were not eligible for a certificate of registration in Ontario. In 2024, the CPSO conducted a jurisdictional scan and determined that other Canadian jurisdictions provided routes to licensure for physicians that were exam-eligible under the PER route. The College has now passed a new registration policy that would enable a physician to obtain a restricted certificate of registration to practice, under supervision, while they complete the RCPSC examinations and pre-conditions to RCPSC certification. To be eligible for the new route, physicians must have an approved medical degree, be a Licentiate of the Medical Council of Canada or have obtained an Acceptable Qualifying Examination (policy), have their international training and education assessed by the RCPSC and have passed the written examination in their specialty. The physician is then granted a restricted certification of registration to practice under supervision until</p>
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		<p>they have obtained certification by the RCPSC, or for a maximum of three years, whichever comes first. The new route brings the CPSO in line with other jurisdictions in Canada and provides a new route to licensure for ITPs that otherwise would have had to undergo additional residency training in Ontario.</p> <p>Overall, the policy reduces barriers to licensure and aligns with the College's commitment to right-touch regulation. In keeping with the above policy changes, the Specialty Recognition Criteria in Ontario policy was amended in 2024 to grant US board-certified or board-eligible osteopathic physicians specialist recognition, and to enable physicians licensed under the RCPSC – PER policy to be recognized as a specialist while they obtain RCPSC certification.</p>
New or consolidated class of certificates or licenses	Yes	New routes to certificates of registration are covered in the policies in the section above.
Assessment of qualifications, including competency-based assessments and examinations	Yes	As outlined in the policy changes above, qualifications (e.g., certification with AOA) that are not listed in the Regulation were deemed as acceptable alternatives under revised policies. These changes to registration requirements has removed barriers for physicians as they no longer require additional training, supervision or practice assessments to obtain a license to practice in Ontario.
Documentation requirements for registration	Yes	Continue to work with Canadian Medical Regulatory Authorities to expedite the credentialing for out-of-province physicians to reduce processing timelines to licensure. We have also reviewed several credentialing requirements for various application types to ensure right-touch regulation and avoid placing unnecessary burden on physicians.

Timelines for registration, decisions and/or responses	Yes	In 2024 the Board approved the new changes to the Acceptable Qualifying Examinations policy, as well as the Certification without Examination with the College of Family Physicians of Canada (restricted certificate) as Directives. As directives, these applications do not need to be reviewed and approved by the Registration Committee, resulting in a streamlined process from application to licensure.
Registration and/or assessment fees	Yes	In 2024, the College again waived application fees for Residents Working Additional Hours for Pay and Out-of-Province Electives. Additionally, the new amendments to the Alternative Pathways to Registration for Physicians Trained in the United States policy, which allows physicians to obtain an independent practice certificate after 5 years, does not include an application fee.
Changes to internal review or appeal process	Yes	The approval of two directives (above) ensures that applications under these policies do not require review internally by the Registration Committee, provided that the registration requirements are satisfied.
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	Yes	Staff and members of the Registration Committee participated in education around effective decision making, and the role of bias

who deal with registration issues		and 'noise' in regulatory decision-making. Staff and the Committee learnt how conscious and unconscious biases impact decisions, as well as how to identify and mitigate cognitive biases that may result in inaccurate or inconsistent decision making in the registration process.
Resources or training to support applicants to move through the licensing process	Yes	As mentioned in the 2023 OFC report, the College continues to review and update the Registration and Membership webpages to ensure clarity and transparency for registration requirements. The College also completed a review and update of the New Member Orientation (NMO) – a series of online learning modules that all new members must complete as part of the licensure process. The NMO helps physicians orientate to practice in Ontario and outlines the requirements of the profession.
Anti-racism and inclusion-based policies and practices	Yes	As part of the CPSO's continued commitment to uphold the rights and underserved communities, changes to by-laws and the launch of the new Physician Register in 2024 saw that physicians could report their gender identify as man, woman, Two-spirit, non-binary, or 'prefer not to say'. The CPSO has continued to examine how, as an organization, we can bring equity, diversity and inclusion (EDI) into our processes, policies, and internally throughout our work at the College. Internal and external speakers have engaged staff in 'Lunch-and-Learn' sessions to provide training and education around accessibility, disability, inclusion, anti-racism, and upholding the rights of LGBTQ2S+ and other underserved communities such as Unhoused populations. Additionally, staff have engaged in training around the role of conscious and unconscious

		biases in decision-making, and how to engage in trauma-informed regulation.
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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	The Registration & Membership Services department and the Registration Committee continue to engage with the medical schools and stakeholders to ensure proactive regulation of the profession. As one example, members of the team have met with Toronto Metropolitan University to ensure the medical school is ready to accept medical students and residents in 2025.
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	The Emergency Class of Registration came into Regulation in 2023. The CPSO continues to use this class and other expedited licensure times (short duration certificates) to ensure physicians are available to practice in Ontario.
Technological or digital improvements	Yes	The College has continued to make enhancements to the online system. In 2024, the new Physician Register was launched which will provide more clarity and transparency for

		members the profession and public. In 2024, the College also launched an IT initiative to introduce a chatbot to answer frequently-asked-questions for members - this work is ongoing.
Steps to address labour shortages in the profession or trade	Yes	As outlined, new and revised policies were approved to provide additional routes to licensure, particularly for internationally trained physicians. CPSO continues to work closely with several stakeholders, including MOHLTC, medical schools, certifying bodies and resident organizations to ensure we are proactively regulating the profession.

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	No
Applicants	No

Additional description:

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B. Other identity-based or demographic data collected

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

Additional description:

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C. Languages of service provision

College of PHYSICIANS AND SURGEONS 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
Physician	49182

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	38163	10253
Provisional/Limited License/Certificate	10963	6643

Emergency Class/Certificate	0	0
All Other Classes	56	52

Gender	Number of Members
Male	26581
Female	22461
X (includes trans, non-binary, and two-spirit people)	36
Other / not collected	104

Jurisdiction of Initial Training	Number of Members
Ontario	24012
Other provinces and territories	7528
United States	914
Other International	16727
Multiple Jurisdictions	1
Other/not collected	0

Country of Initial Training	Number of Members
Canada	31529
Ireland	1603
India	1454
United Kingdom	1037
Pakistan	927
United States of America	913
Egypt	874
Saudi Arabia	851
Nigeria	693
Iran	677
Grenada	534
Australia	481

Saint Kitts and Nevis	442
Iraq	416
South Africa	369
Poland	337
Brazil	279
Israel	272
Libya	260
Dominica	197
Romania	176
Russia	173
Sri Lanka	164
Philippines	161
Colombia	143
Mexico	139
China	124
Jamaica	121
Italy	112
Germany	108
Hong Kong	107
United Arab Emirates	95
Argentina	94
Barbados	94
Syria	92
Hungary	88
Kuwait	87
Ukraine	87
Bangladesh	85
Jordan	83
Bahrain	79
Antigua and Barbuda	76
Lebanon	76
Oman	70
France	65
Sudan	55
Czechia	54
Chile	53
Cayman Islands	50
Trinidad and Tobago	48

Spain	43
Switzerland	43
Netherlands	39
Turkiye	39
New Zealand	37
Saint Vincent and the Grenadines	35
Thailand	34
Dominican Republic	33
Japan	33
Ethiopia	32
Ghana	32
Greece	32
Belgium	30
Cuba	30
Saint Lucia	30
Vietnam	29
Kenya	28
Bulgaria	25
Uganda	25
Costa Rica	24
Taiwan	23
Congo	22
Peru	22
Venezuela	22
Yemen	22
Austria	19
Nepal	19
Albania	16
Guyana	16
Belarus	15
Malaysia	15
Serbia	15
Singapore	14
Zimbabwe	14
Myanmar	13
Palestine State	13
Slovakia	13
Qatar	12

Tanzania	12
Algeria	10
Belize	10
Kazakhstan	10
Morocco	10
Haiti	9
Latvia	9
Malta	9
Croatia	8
Ecuador	8
Guatemala	8
Portugal	8
Senegal	8
Sweden	8
Indonesia	7
Moldova	7
Tunisia	7
Uzbekistan	7
Afghanistan	6
Armenia	6
North Macedonia	6
Rwanda	6
Zambia	6
Cameroon	5
El Salvador	5
Lithuania	5
Panama	5
Uruguay	5
Bolivia	4
Denmark	3
Malawi	3
Nicaragua	3
Paraguay	3
Somalia	3
Bosnia and Herzegovina	2
Estonia	2
Finland	2
Iceland	2

Kyrgyzstan	2
Mauritius	2
Norway	2
Azerbaijan	1
Gambia	1
Georgia	1
Madagascar	1
Samoa	1
Slovenia	1
Togo	1
Other Countries	870

Official language of preference	Number of Members
English	43566
French	5616

Racial identity (optional)	Number of Members
Not collected	49182

E. Data Notes

A.1. In 2024, the CPSO has included the following types of certificates under the "Provisional/Limited License/Certificate" category: Restricted certificates, Postgraduate certificates, and Academic Practice certificates. The "All Other Classes" category only includes Supervised Short Duration and Temporary Independent Practice certificates, only. A.5. Language is self-reported. 'French' reported number is the number of members who indicated they did not have a preference between English and French. A.6. The College does not collect racial identity data.

F. Applicant Profile

Profession Name	Total Number of Applicants
Physician	7342

Gender	Number of Applicants
Male	3619
Female	3539
X (includes trans, non-binary, and two-spirit people)	13
Other / not collected	171

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Other provinces and territories	1066	7
United States	123	3
Other International	3249	37
Multiple Jurisdictions	1	0
Other/not collected	795	65
Ontario	2108	3

Country of Initial Training	Number of Applicants
Canada	3175
Saudi Arabia	386
Ireland	338
United Kingdom	220
Nigeria	210
India	192

Pakistan	192
Iran	136
United States of America	123
Australia	102
Israel	80
Brazil	78
Egypt	78
Grenada	68
Saint Kitts and Nevis	49
Mexico	46
Philippines	42
Colombia	39
Italy	33
United Arab Emirates	33
Bahrain	32
Iraq	32
Kuwait	31
Lebanon	28
Argentina	25
Hungary	25
Poland	25
Barbados	24
Chile	23
Thailand	23
France	20
Germany	20
Jamaica	18
Libya	18
Oman	18
Ukraine	18
Jordan	17
South Africa	17
Switzerland	17
China	16
Turkiye	16
Japan	15
Russia	15
Sudan	15

Syria	15
Spain	14
Belgium	13
Antigua and Barbuda	12
Bangladesh	12
Cayman Islands	12
Ghana	12
Trinidad and Tobago	12
Dominica	10
Hong Kong	10
Kenya	10
Romania	10
Costa Rica	9
Malaysia	9
Peru	9
Singapore	9
Ethiopia	8
Nepal	8
Yemen	8
Cuba	7
New Zealand	7
Sri Lanka	7
Netherlands	6
Palestine State	6
Qatar	5
Uganda	5
Austria	4
Czechia	4
Ecuador	4
Greece	4
Malta	4
Rwanda	4
Congo	3
Guatemala	3
Lithuania	3
Saint Lucia	3
Saint Vincent and the Grenadines	3
Sweden	3

Tanzania	3
Albania	2
Bulgaria	2
Dominican Republic	2
Finland	2
Guyana	2
Moldova	2
Panama	2
Paraguay	2
Venezuela	2
Zimbabwe	2
Afghanistan	1
Azerbaijan	1
Belarus	1
Belize	1
Bolivia	1
Croatia	1
Denmark	1
El Salvador	1
Gambia	1
Indonesia	1
Kazakhstan	1
Latvia	1
Mongolia	1
Morocco	1
Myanmar	1
North Macedonia	1
Portugal	1
Samoa	1
Senegal	1
Sierra Leone	1
Slovakia	1
Taiwan	1
Uruguay	1
Vietnam	1
Zambia	1
Other Countries	879

Official language of preference	Number of Applicants
English	7161
French	181

Racial identity (optional)	Number of Applicants
Not collected	7342

G. Data Notes

B.3 - "other countries" also includes applications in which the physician did not list the jurisdiction of initial training (i.e., "unidentified") B.4 - Language is self-reported. 'French' represents the number of members who indicated they did not have a preference between English and French languages. B.5 - the College does not collect racial identity data

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.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Other provinces and territories	1187	1	303
United States	154	0	62
Other International	4054	11	1555
Multiple Jurisdictions	1	0	0
Other/not collected	0	5	754

Ontario	2233	1	594
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I. New Registrants

For the 2024 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	1931	741
Provisional/Limited License/Certificate	5193	3164
Emergency License/Certificate	0	0
All Other Classes	52	45

J. Data Notes

B.7 - "Withdrawn" includes applications that are withdrawn or cancelled at the applicant's request, and applications that are abandoned because they are not completed within the 1 year application window. B.8 - "Provisional/Limited License/Certificate" includes Restricted certificates, Academic Practice certificates and Postgraduate certificates. "All Other Classes" includes Supervised Short Duration and Temporary Independent Practice certificates, only.

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
Other provinces and territories	0	0
Other International	0	0
Ontario	0	0
United States	0	0
Multiple Jurisdictions	0	0
Other/not collected	0	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.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Other provinces and territories	2	0
Other International	6	0
Ontario	0	0
United States	1	0
Multiple Jurisdictions	0	0
Other/not collected	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.

Issue or reason raised	Number of appeals

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
1. Does not satisfying the requirements for a certificate of registration under the Regulation 2. Does not meet the non-exemptible requirements under Section 2 of the Regulation 3. Does not satisfy the requirements under a registration policy	

L. Data Notes

B.11 - the College does not receive information related to why an applicant has appealed a decision B.10 - two appeals were withdrawn in 2024, all other appeals remain ongoing B.12 - number of applicants is not provided as one application might be refused based on multiple reasons (i.e., not meeting Regulation and Section 2)

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.