



March 29, 2023

To whom it may concern,

CAMRT appreciates this opportunity provide feedback on proposed changes to regulations. We would also like to thank the CMRITO for responding to our questions about the proposed changes during the open consultation period.

The CAMRT has undertaken a full and detailed review of the proposed changes to regulations and offers below its detailed feedback for consideration by the CMRITO Council.

As currently written, the amendments to registration classes at the CMRITO raise significant concerns for the CAMRT and its members, both in Ontario and across the country. The association is concerned that in seeking to find a solution to one problem (an emergency), the changes as proposed have the potential to pose undue risk for public safety in the future.

Our foremost concern is how all changes taken together create a parallel pathway for entry into registered MRT practice in the province of Ontario, significantly undermining the established certification and accreditation processes. As written, in the context of an emergency, the regulation would substitute certification for the attestation of an employer (supervisor), who, having just operated under a declared emergency, would be asked to take full responsibility for evaluating the fitness and competence of the emergency registrant to practice. The potential for these decisions to be influenced by the need to retain staff at the expense of public safety is high and, in our opinion, an unacceptable risk. CAMRT believes that such a process, which bypasses standards and benchmarks for minimal competence, would place both the safety of the patient and the credibility of the MRIT credential at risk.

Currently, the credibility of the MRIT credential is established through a non-biased third-party evaluation and validation of competence at entry to practice. An independent, objective assessment of minimum competence is a long established and proven method to ensure the benchmark for minimal competence for entry to the profession is maintained.

The possibility that the regulation, as proposed, would create a pathway to full registration for candidates from unaccredited education programs is also troubling. Both CAMRT and the provincial regulators have long supported and upheld the essential place of accreditation. Accreditation provides an objective, evidence-based assessment of the quality of MRT educational programming, ensuring that graduates meet the standards of competence for entry to practice.

Accreditation and certification are complimentary processes, ultimately serving as key gate-keeping components, ensuring those entering practice have met the national benchmark for minimal competence. Without a requirement for either or both, the system that has so long upheld quality and safety standards could collapse.

Finally, as a national association, these changes also pose a concern to us as they affect the Canadian Free Trade Agreement (formerly the Agreement on Internal Trade (AIT)). In, and following an emergency, the proposed regulations in Ontario would open a pathway for uncertified MRITs to gain registration in a single province. As certification is a key component of the Canadian Free Trade Agreement, and individuals who obtain full registration with CMRITO through the proposed pathway could cause other jurisdictions to file exemptions thought the labour mobility provisions within this legislation.

#### **Recommended additions and amendments**

CAMRT believes in the established value of certification and accreditation. If an emergency class of registration which bypasses the certification process must be created, it must, in the view of CAMRT, be safeguarded by certain important conditions:

**1) The pathway to full licensure following emergency class registration should include certification**

We understand that fairness to emergency class registrants must be considered when discussing their pathway to licensure following an emergency. However, CAMRT also believes that there is balance to be found between removing the burden to registrants and maintaining the integrity of certification in the province.

In researching our response, we found numerous examples from other professions in Ontario undertaking the identical consultation with their members. Their approaches offer examples like measures to relieve financial burdens or to provide alternatives for emergency class registrants to practice temporarily post-emergency other than full registration.<sup>1</sup> CAMRT believes such examples must also be explored for the MRT profession.

One such example can be found in the MRT profession, with ACMDDT temporary practice licensure for graduates of Canadian Accredited programs. This license category is temporary in nature and PLI is provided to these registrants through CAMRT. In its present iteration, IEMRTs are not included for ACMDDT temporary

<sup>1</sup> See <https://www.collegept.org/consultations/bill-106> and <https://www.cno.org/globalassets/1-whatiscno/pc-redline-emergency-class.pdf>

licensure, but CAMRT acknowledges they could be included provided additional consideration of the risk profile of these individuals, which significantly differs from Canadian graduates.

**2) Emergency- class registration should be closed to those that have already failed the CAMRT certification exam multiple times**

The broad language with which the current amended regulations are written creates a pathway to licensure for those who have already attempted the national certification exam and failed on multiple occasions. Emergency class registration should not create a pathway for those candidates that failed to achieve CAMRT certification in Canada already from gaining entry into the workforce without certification. CAMRT highly recommends inclusion of conditions that would remove eligibility for those who have attempted and failed the certification exam. Other professions have added language to this effect to address this scenario.<sup>2</sup>

**3) Emergency- class registration should be closed to Canadians from non-accredited education**

The broad way in which the conditions are written also provide a pathway for licensure for those who graduate from non-accredited programs, providing no oversight for the quality and content of educational programming received by individuals seeking to work in MRT practice in emergency situations. We highly recommend inclusion of conditions that would remove eligibility for those who have graduated from a Canadian program that is non-accredited.

**4) Ensure there is no pathway to licensure to those that have lost their licensure in other jurisdictions**

We believe it is also critical that there be language that clarifies that this class would not be open to MRITs that have lost their licensure in other jurisdictions.

**5) Recent experience in the MRT profession should not be broadly exemptible, as currently written**

CAMRT understands that this language may have been added to address a known group of individuals currently working in Ontario facilities, within departments, but outside of licensure as it currently exists. Rather than creating a broad exemption open to all, CAMRT recommends a specific exemption be crafted to allow for the known instance.

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<sup>2</sup> This recommendation is consistent with language within the changes proposed by the College of Nurses of Ontario in response to the same request for establishment of an Emergency Class of registration. See. P 15, 7 (6) 6. <https://www.cno.org/globalassets/1-whatiscno/pc-redline-emergency-class.pdf>

**6) A clear definition of the conditions for the declaration of an emergency be included**

It is difficult to fully weigh our concerns and comments on this emergency class of registration without any explanation for what constitutes an emergency in the current documentation. While we grant that such a class of practice would be warranted in emergencies of certain magnitude, having vague language without clearly defined conditions makes it too easy for future implementations to be declared outside of currently understood boundaries.

**7) Clearer definition for supervision in the emergency class**

Based on current regulations it is unclear whether the requirement is direct or indirect supervision. Furthermore, there is very little language to define who may qualify to be declared as supervisor, nor what the responsibilities of supervisions would be during the emergency period. CAMRT recommends language be added to the proposed changes to regulation, or in some equally accessible companion documentation, that more clearly identifies required aspects of supervision.

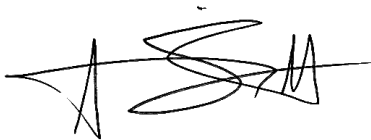
**8) Relevant data, including historical certification exam performance, should be used when evaluating applicants from international jurisdictions for acceptance into the emergency class licensure**

Factoring in historical data related to certification exam performance will provide additional assurances that the individuals being selected to hold an emergency class licensure are most likely to meet the minimum standard for safe and effective practice in Canada, thus decreasing overall risk profile.

Thank you for your considering our feedback. Should you have any questions or need any clarification, please don't hesitate to contact us.

Yours sincerely,

Irving Gold



Chief Executive Officer, CAMRT