

April 18, 2023

To whom it may concern,

CAMRT appreciates this further opportunity to provide feedback on the proposed changes this regulation.

We would like to thank the CMRITO for considering and responding to the concerns we raised in our initial feedback (dated March 29). We believe making MRT certification a non-exemptible requirement for access to full registration for candidates is essential for patient safety, to protect the public, and for maintaining the integrity of the MRT profession in the province. We commend the change for all the reasons stated in our previous letter.

The CAMRT has taken the time to review the latest amended regulations, and would like to reiterate a couple of remaining concerns from our March 29 communication:

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

The way in which the current amended regulations are written still leaves emergency class registration open to those who have already attempted the national certification exam and failed on multiple occasions. 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.¹

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

The current amended regulations still make recent MRT working experience exemptible. CAMRT believes that the five (5) year requirement allows ample room for candidates that may have temporarily left practice to access emergency registration. The CAMRT believes this would be in better alignment with MRT regulators in other provincial jurisdictions.

As previously stated, CAMRT understands that this language may have been added to address a known group of individuals currently working in Ontario

¹ 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>



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.

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

Yours sincerely,

Irving Gold

A handwritten signature in black ink, appearing to read "Irving Gold", written over a horizontal line.

Chief Executive Officer, CAMRT