



March 24, 2023

By E-mail

Ministry of Health
Health Workforce Regulatory Oversight Branch
Nursing and Professional Practice Division
438 University Avenue, 10th Floor
Toronto ON M5G 2K8

To Whom It May Concern:

Re: College of Medical Radiation and Imaging Technologists of Ontario (CMRITO), Creation of Emergency Class Certificate of Registration

The College of Nurses of Ontario (CNO) is grateful for the opportunity to provide feedback on the College of Medical Radiation and Imaging Technologists of Ontario's (CMRITO's) draft Emergency Class regulations. In particular, we are providing feedback on subsection 5(4).

A valid, reliable and secure entry examination supports safe practice. As regulators, we are accountable for ensuring that only those who demonstrate the competence can practice autonomously as practitioners (i.e. to transition to their specialty certificate of registration). The entry exam is an objective assessment, assessing in a standardized way whether an individual will have the knowledge, skill and judgement to practice safely.

Literature links an entry examination to patient safety. For example, studies have investigated the correlation between national registration exam performance and patient safety¹. Studies show those who score lower on the exam are at greater risk of providing

¹ Cuddy, M.M., Young, A., Gelman, A., Swanson, D., Johnson, D.A., Dillon, G.F., & Clauser, B.E. (2017). Exploring the relationships between USMLE performance and disciplinary action in practice: A validity study of score inferences from a licensure examination. *Academic Medicine*, 92(12), 1780-1785. DOI: 10.1097/ACM.0000000000001747; Kinney, C.L., Raddatz, M.M., Sliwa, J.A., Clark, G.S., & Robinson, L.R. (2019). Does performance on the American Board of Physical Medicine and Rehabilitation initial certification examinations predict future physician disciplinary actions? *American Journal of Physical Medicine & Rehabilitation*, 98(12), 1079-1083. DOI: 10.1097/PHM.0000000000001250; Norcini, J., Boulet, J.R., Opalek, A., & Dauphinee, W.D. (2014). The relationship between licensing examination performance and the outcomes of care by international medical school graduates. *Academic Medicine*, 89(8), 1157-62. doi: 10.1097/ACM.0000000000000310; Tamblyn, R., Abrahamowicz, M., Dauphinee, D., Wenghofer, E., Jacques, A., Klass, D., Smee, S., Blackmore, D., Winslade, N., Girard, N., Du Berger, R., Bartman, I., Buckeridge, D. L., & Hanley, J. A. (2007). Physician scores on a national clinical skills examination as predictors of complaints to medical regulatory authorities. *JAMA*, 298(9), 993-1001. <https://doi.org/10.1001/jama.298.9.993>; Wenghofer, E., Klass, D., Abrahamowicz, M., Dauphinee, D., Jacques, A., Smee, S., Blackmore, D., Winslade, N., Reidel, K., Bartman, I. & Tamblyn, R. (2009). Doctor scores on

an unacceptable quality of patient care. For example, they are subject to higher rates of complaints and reports with disciplinary action taken. This speaks to the importance of this objective registration requirement with respect to safe patient care.

Demonstrating competence through a standardized examination before practicing autonomously is important to patient safety. Thus, we recommend amending subsection 5(4) in your draft regulation and not waive the examination requirement.

Thank you again for the opportunity to provide input. Should you require further information, or if you wish to discuss our recommendation, please contact Anne Marie Shin, Director of Professional Practice at ashin@cnomail.org.

Sincerely,

Silvie Crawford, RN, BHScN, LLM-Health Law
Executive Director and CEO

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