



March 24, 2023

Ms. Pree Tyagi
Registrar & CEO
College of Medical Radiation &
Imaging Technologists of Ontario
By email: pree.tyagi@cmrito.org

Re: Proposed Amendments to the Registration Regulation – Emergency Class of Registration

Dear Ms. Tyagi,

Thank you for inviting Sonography Canada to comment on the proposed amendments to the Registration Regulation under the Medical Radiation and Imaging Technology Act (2017) allowing Emergency Class registration of DMS' and MRTs in the province of Ontario.

While we appreciate the need to ensure that there is an appropriately sized workforce in place, especially in emergency situations, we do have some concerns about the potential implications the proposed revisions may have on sonographer workforce competency and ultimately on patient safety and care.

As the national certification body for sonographers in Canada, Sonography Canada will always advocate for all registrants seeking to practice sonography in Ontario to first demonstrate their competence by satisfying conditions laid out in sub-section (1), paragraphs 1, 2, 3 and 5 of the Registration Regulation, particularly the successful fulfillment of the Sonography Canada certification examinations. To this end, during the COVID-19 pandemic, Sonography Canada took quick and decisive action to ensure our certification exams remained readily available to candidates. In fact, exams became more accessible by using secure remote proctoring which allows candidates to write both within and outside of Canada. Additionally, provisions were made to expedite the examination/certification process to allow candidates to enter the workforce more quickly.

In reviewing the proposed amendments, one general observation, is that the term “emergency” has not been defined in the Regulation. This could allow for broad interpretation by policy makers. We would appreciate knowing which criteria must be met for the enactment of the Emergency Class of registration in Ontario.

That aside, we support and encourage the College of Medical Radiation and Imaging Technologists of Ontario (CMRITO) to follow its stated intent to develop an application process for emergency DMS' and MRTs that takes some aspects of the regulation and registration process into account, namely:

- To identify and prioritize those jurisdictions where sonographer education and practice is substantially similar to those experienced in Canada and to apply these demographic criteria to applications from those outside of Canada.

Furthermore, we applaud the CMRITO for seizing the opportunity to grant Emergency Class registration to applicants who have graduated, or are close to graduating, from accredited education programs and who have not yet written the required certification examinations. We feel that this will expedite entry to the workforce while awaiting the next examination sitting for those who would be most likely to seek certification.

Sonography Canada would encourage CMRITO to facilitate access to the Sonography Canada exams for recent graduates waiting to write the certification exams even outside of the emergency class (perhaps as a supervised graduate license), to align with other regulated jurisdictions and professions. This will allow entry-level graduates to seamlessly integrate into the workforce without a gap in their novice clinical competence and could provide earlier resolution of health human resource challenges.

In the interest of public safety, Sonography Canada is pleased to note that once an applicant obtains an Emergency Class registration, they:

- will only be allowed to practice in the areas in which they are educated;
- may only work under the supervision of a CMRITO member in good standing who is approved by the Regulator;
- Will be limited in their scope of practice activities to those which they are able to perform;
- must inform patients that they are working under the provisions provided in the Emergency Class registration;
- must renew the Emergency Class registration annually and that the same conditions will be imposed upon each renewal; and
- must comply with continuing education requirements mandated by the Regulator and must hold professional liability insurance.

Once an emergency state is lifted, we note that Emergency Class registrants will be able to seek full registration. As proposed, an Emergency Class registrant with the minimum 400 hours of supervised practice would then be able to proceed to full registration without a supervisory stipulation and with exemption from successful completion of the national certification exams. Sonography Canada does not support this proposed amendment.

The public rightfully assumes that medical imaging professionals have met specific education, certification, and clinical experience standards and that all imaging professionals have been assessed by appropriate bodies. Sonography Canada strongly encourages the CMRITO to reconsider this exemption, specifically to maintain the required completion of the Sonography Canada certification exams for ALL Emergency Class registrants within a defined timeframe as determined by the CMRITO. As previously stated, the Sonography Canada exams are accessible across Canada and internationally and provided three times per calendar year. Requiring completion of the exams ensures all imaging professionals in Ontario have met consistent standards to ensure public safety.

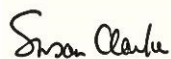
As the amendments are currently proposed, theoretically, if an emergency resolves quickly, an individual may have worked only for the minimum of 400 supervised hours (50 full workdays) within the past five years which may not be sufficient time to assess competency for full practice. In the event that exemption of the certification exams remains included as an amendment, Sonography Canada provides the following recommendations for consideration:

- Increase the minimum supervised practice hours that a registrant must have acquired during the state of emergency before they could apply for exemption of the certification exams. We would recommend one full year of uninterrupted supervised practice. Emergency Class registrants who meet this and have no complaints against them could be exempt from the certification exam and eligible for Specialty Class (along with all other requirements as determined by the CMRITO).
- Emergency Class registrants who have acquired less than the minimum hours can remain in the Emergency Class but with all restrictions, including supervision, *or*
- Emergency Class registrants who have acquired less than the minimum number of hours can write the Sonography Canada exams to become eligible for Specialty Class (along with all other requirements as determined by the CMRITO).

As always, Sonography Canada appreciates the collaborative working relationship with the College of Medical Radiation and Imaging Technologists of Ontario and we would be pleased to participate in further discussion, as needed.

Thank you for the opportunity to submit comment regarding these proposed amendments to the Registration Regulation. If you require further information, please do not hesitate to be in touch.

Best regards,



Susan Clarke, MBA
Executive Director

c.c. Ms. Caroline Morris
Deputy Registrar & Registration Director
caroline.morris@cmrito.org

Ms. Elizabeth Urso
Professional Conduct &
Regulatory Affairs Director
elizabeth.urso@cmrito.org