



College of  
Medical Radiation  
Technologists of  
Ontario

Ordre des  
technologues en  
radiation médicale  
de l'Ontario

# CMRTO Transparency Review Report March 16, 2015

**Accepted by Council March 27, 2015**

On November 28, 2014, CMRTO submitted its response to the Minister of Health and Long-Term Care's directive that health regulatory colleges make transparency a priority and make tangible strides to continually increase transparency in college governance structures. The direction from the Minister of Health and Long-Term Care is attached to this report as Appendix 1, and the CMRTO's report to the Minister is attached as Appendix 2.

This second transparency report, a review, was conducted by CMRTO with a view to comparing and contrasting the CMRTO's response to the MOHLTC, with those of other health regulatory colleges. This review will highlight the additional information about members that colleges are proposing be added to the public register as well as other initiatives being undertaken to increase transparency.

This review also outlines the transparency principles developed by the Advisory Group for Regulatory Excellence (AGRE) which are guiding the transparency work at health regulatory colleges for Council's consideration and endorsement if deemed appropriate.

## **AGRE Transparency Principles**

The principles are set out below:

1. The mandate of regulators is public protection and safety. The public needs access to appropriate information in order to trust that this system of self-regulation works effectively.
2. Providing more information to the public has benefits, including improved patient choice and increased accountability for regulators.
3. Any information provided should enhance the public's ability to make decisions or hold the regulator accountable. This information needs to be relevant, credible and accurate.
4. In order for information to be helpful to the public, it must:
  - be timely, easy to find and understand
  - include context and explanation.
5. Certain regulatory processes intended to improve competence may lead to better outcomes for the public if they happen confidentially.

6. Transparency discussions should balance the principles of public protection and accountability, with fairness and privacy.
7. The greater the potential risk to the public, the more important transparency becomes.
8. Information available from Colleges about members and processes should be similar.

### **Approaches of other RHPA colleges**

A summary of the transparency initiatives highlighted by each RHPA college in their response to the Minister of Health and Long-Term Care in December 2014 was considered by the CMRTO Council on March 27, 2015 including initiatives relating directly to member information and others that relate to other college processes and information.

The AGRE colleges decided to break the transparency work into two phases and are each proceeding with the consultation, communication and bylaw amendments necessary to implement those changes. Each AGRE college is proceeding with Phase 1 and 2 changes according to their own timelines and effective dates and other implementation details vary amongst AGRE colleges.

Many colleges have endorsed or adopted the AGRE transparency principles as the first step in their transparency journey. Thereafter, colleges have proceeded or will proceed with activities in keeping with their own Council's direction, resources, and strategic priorities.

A list of the actions that AGRE has recommended is set out below:

1. Enhanced website description of what member information is and is not available
2. Public information available promptly on the website (CMRTO already has real-time update)
3. Consistent approach to number and name of Inquiries, Complaints and Reports Committee (ICR Committee) outcomes, definitions and criteria (risk rating)
4. Review of public register using the best practice guidelines and recommendations to evaluate navigation, search, information, access, clarity and relevance
5. Increased focus on data analysis to inform regulatory activities and public reporting

A list of additional information that AGRE has recommended be added to the public register is set out below:

1. Date referred to Discipline
2. Discipline committee status
3. Full Notice of Hearing
4. Criminal findings of guilt (relevant to the practice of the profession)
5. Bail conditions (relevant to the practice of the profession)
6. Non-members practicing illegally (CMRTO already posts)
7. Names of former members (fact and date of death, if known)
8. Health facility privileges
9. Criminal charges (relevant to the practice of the profession)
10. Known license in other jurisdictions
11. Known discipline findings in other jurisdictions

12. Discipline Committee (no finding) (Requires a statute change)
13. Undertakings
14. Oral cautions issued by a panel of the ICR Committee
15. Specified Continuing Education and Remedial Programs (SCERPs) issued by a panel of the ICR Committee

Please note that any proposed change to the information that is available on the public register will require a bylaw change. The proposed bylaw would also need to be circulated to members and stakeholders for at least 60 days and all input received considered by Council prior to being approved.

It should be noted that making ICR Committee outcomes public is somewhat controversial as the ICR Committee has no authority to make 'findings' per se and there are those in the legal community who argue that this will almost certainly be the subject of a court challenge.

The AGRE colleges have been generous in sharing not only their research and resources but also their experiences during their transparency journey. All the advice we have heard is that this process takes time and involves almost every process and program across the organization and requires a considered approach. AGRE colleges have indicated that the most important thing is to start the conversation with members and staff and Council and Committees so that everyone can understand what transparency is all about and carefully consider the implications.

## **Recommendations**

It is recommended that Council consider the following:

1. endorsing the AGRE Transparency Principles
2. directing staff to bring forward a project plan and implementation schedule for Council's consideration moving forward
3. placing *Transparency* as a standing item on the agenda of each Council meeting not only to track progress of its own project, but also to stay abreast of developments in the health regulatory community

## **Outcome of CMRTO Council review**

At its meeting on March 27, 2015, the CMRTO Council:

1. Accepted the Transparency Review Report dated March 16, 2015
2. Endorsed the AGRE Transparency Principles for use as the decision framework in its transparency review
3. Directed that the topic 'Transparency Initiative' be a standing item on the agenda of each Council meeting
4. Directed the CMRTO staff to develop a project plan for the implementation of the Transparency Initiative for consideration by Council at the June 2015 Council meeting

# CMRTO Transparency Review Report March 16, 2015

## Appendix 1

Accepted by Council March 27, 2015

Ministry of Health  
and Long-Term Care

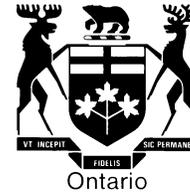
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Dear College Presidents and Registrars/Executive Directors:

My duty as Minister under the *Regulated Health Professions Act, 1991* (RHPA) includes ensuring that the health professions are regulated in the public interest. As part of that, my responsibility is to ensure that all Ontarians have access to information that is relevant and timely, useful and accurate -- information that evokes public confidence and enhances the public's ability to make informed decisions about their care. It is the right thing to do.

To deliver on my commitment to providing Ontarians with the information they need, I am asking you to share more information and make our system more transparent when it comes to regulating our health professions. I am asking you not only to improve transparency, but to work together with each other and with us to make this a reality.

I know that many colleges are working individually or together through organizations such as the Advisory Group on Regulatory Excellence (AGRE) to improve transparency. I also know that many of you have dedicated resources to improve transparency. I am asking that all colleges move collectively to make transparency a priority.

Specifically, I am asking each Council and transitional Council to:

1. Make transparency a priority objective in each of your strategic plans, if it is not yet a stated priority. This is crucial because it places transparency at the heart of what you do, and will ensure it remains a priority in the future.
2. Take concrete steps to develop and establish measures that will continuously increase transparency in College processes and decision-making, and that will make more information available to Ontarians.

Your transparency initiatives should include:

1. How you will be strengthening existing measures that the College or transitional Council has in place to enhance transparency; and,

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College Presidents and Registrars/Executive Directors

2. New measures that the Council or transitional Council will develop and implement to increase transparency in College processes, decision-making and information disclosure.

In the coming days, Suzanne McGurn, Assistant Deputy Minister, Health Human Resources Strategy Division, will be writing to you regarding these initiatives.

In addition, I ask Colleges with inspection programs to publicly disclose full, detailed, useful information with respect to each inspection they conduct. These reports should include, at a minimum:

- the purpose of the inspection;
- the results of that inspection;
- the reasons for those results;
- any deficiencies identified by the inspectors; and
- any conditions that apply.

These publicly disclosed reports must bear in mind applicable principles of fairness and privacy.

I appreciate that it may take time for some Colleges to adjust their processes and procedures so that they can fully disclose detailed information about their inspections and other transparency measures; this may include the introduction of new or the amending of existing by-laws.

However, it is in the public interest for these measures to be undertaken as soon as possible. Making more detailed, timely, accurate and clear information relating to inspection reports publicly available, as well as other transparency measures, is important to maintaining confidence in Ontario's health professions regulatory system, and in our health care system more broadly.

Therefore, I ask that College Councils and transitional Councils report back to my Ministry by December 1, 2014, on the specific steps that will be taken to make all of these transparency measures possible. Please report back to the following ministry official:

Suzanne McGurn, Assistant Deputy Minister  
Health Human Resources Strategy Division  
Ministry of Health and Long-Term Care  
900 Bay Street  
Macdonald Block, 2<sup>nd</sup> Floor, Room M2-61  
Toronto ON M7A 1R3  
E-mail: Suzanne.McGurn@ontario.ca

College Presidents and Registrars/Executive Directors

My hope is that we can work collaboratively to implement these steps as we work together to maintain the public's trust in our health care system.

However, as Ontario's Minister of Health and Long-Term Care, my ultimate responsibility is to the people of Ontario. I reserve the right to take any and all necessary measures to ensure that the public interest remains paramount, including exercising the powers reserved to me under subsection 5(1) of the RHPA including the ability to require Councils to do anything that, in my opinion, is necessary or advisable to carry out the intent of the RHPA and the health profession Acts.

I am confident that all College Councils and transitional Councils will undertake these necessary initiatives to improve transparency in a way that serves and protects the public interest. I hope you will join with me to ensure that, together, we can maintain public confidence in Ontario's health care system. That is our collective duty.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Eric Hoskins". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dr. Eric Hoskins  
Minister

**March 16, 2015**

**Accepted by Council March 27, 2015**

November 28, 2014

College of  
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Ordre des  
technologues en  
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The Honourable Dr. Eric Hoskins  
Minister of Health and Long-Term Care  
Hepburn Block, 10<sup>th</sup> Floor  
80 Grosvenor Street  
Toronto, ON M7A 2C4

Dear Minister Hoskins :

On behalf of the College of Medical Radiation Technologists of Ontario (CMRTO) I submit CMRTO's response to your letter dated October 4, 2014, and Assistant Deputy Minister McGurn's letter dated October 28, 2014, regarding transparency.

The above correspondence asked that colleges make transparency a priority and make tangible strides to continuously increase transparency in our governance structures.

CMRTO continued to take initiatives in 2013 and 2014 to confirm our commitment to making accountability and transparency the keystones of our decision-making and our strategic direction as a college.

Council launched a comprehensive review of its governance structure and practices, the goal of which was to ensure the CMRTO is meeting or exceeding current expectations for accountability and transparency in its governance. Further to this, we have expanded the information available on the public register about medical radiation technologists (MRTs), approved a new strategic plan and approved a new communications strategy for the next three years. The attached report will elaborate upon these initiatives and how they will add to and strengthen the existing measures that the CMRTO has in place to enhance transparency.

Sincerely,

Linda Gough  
Registrar

c: Suzanne McGurn, Assistant Deputy Minister

encl.

# Report



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**To:** Suzanne McGurn, Assistant Deputy Minister,  
Health Human Resources Strategy Division,  
Ministry of Health and Long-Term Care

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**From:** Council of the College of Medical Radiation Technologists of Ontario (CMRTO)      **Date:** November 28, 2014

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**Subject:** CMRTO Report on transparency measures and initiatives

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The Council of the CMRTO is pleased to provide this report on the CMRTO's past, current and future initiatives to increase transparency while meeting its obligations to regulate the profession of medical radiation technology to serve and protect the public interest.

It is noted that the CMRTO does not have any facility inspection process in place, and neither is there any plan to have one in the near future.

## **A. Transparency initiatives already completed:**

### **1. By-law changes to information available on the CMRTO public register**

CMRTO expanded the information available on its public register about medical radiation technologists (MRTs) through an amending by-law, effective September 1, 2013. Enhancements were made to the computer database for the register to expand the information recorded electronically regarding specialty certificates of registration held by MRTs.

Following is a list of the additional information which is available to the public, beyond the statutory requirement set out in the Health Professions Procedural Code of the Regulated Health Professions Act (RHPA):

- any given names that an MRT may use in his or her practice, in addition to the member's legal name
- the CMRTO registration number
- where a person has resigned as a member, a notation to this effect and the date upon which the person resigned. The resigned person's information remains on the public register for five years following the resignation

- the date of the MRT's initial registration
- a notation of any reinstatement, and the date of reinstatement
- a detailed history of each specialty certificate of registration held by the MRT (radiography, nuclear medicine, radiation therapy and/or magnetic resonance) since September 1, 2013, including the date on which each specialty certificate was issued and the date on which the MRT ceased to hold such specialty certificate. An MRT's registration history prior to September 1, 2013 may also be indicated but only to the extent of the information being readily available to the CMRTO as of September 1, 2013
- the name of the member's employer, for the primary place of practice and all other places of practice, if any
- the member's business address and business telephone number for all places of practice, in addition to the primary place of practice
- the date of any referral to the Discipline Committee that is still outstanding
- a summary of the allegations regarding any referral to the Discipline Committee that is still outstanding
- the date of the hearing of the Discipline Committee if any hearing has been set
- the next scheduled date for the continuation of any hearing of the Discipline Committee if the hearing was adjourned
- the place of the hearing of the Discipline Committee if any hearing has been set
- any information that the CMRTO and the MRT have agreed should be in the register and available to the public
- a summary of any existing restriction on a member's right to practise imposed by a court or other lawful authority (if the CMRTO is aware of the restriction)
- where any findings of the Fitness to Practise Committee are appealed, a notation of the appeal, until the appeal is disposed of

## **2. 2014-2016 Strategic Plan**

In 2013, the CMRTO undertook a strategic planning process so as to identify the direction for the CMRTO over the three year period 2014-2016. The strategic planning process included an environmental scan, in-depth interviews with stakeholders and workshops with CMRTO's Council, statutory committees and senior management. The final strategic plan was approved by the Council in December 2013 and is available on the CMRTO website.

In the strategic plan, the CMRTO reaffirms its commitment to meeting its legislated obligations set out in the RHPA, the Health Professions Procedural Code, and the Medical Radiation Technology Act with integrity and diligence.

There are three strategic goals for the CMRTO over the next three years:

- Facilitate the safe use of new and changing diagnostic and therapeutic technologies by MRTs
- Contribute to quality patient care and treatment through leadership and collaboration
- Increase awareness and understanding of the role of the CMRTO through strategic communications with the public stakeholders and members

There is an expressed recognition that emphasis needs to be put on effective and timely communication to stakeholder audiences, especially the public. This is important given the speed of communications today, the focus on accountability of regulated health professionals and all public institutions, and the needs of the public as they relate to transparency and information about regulation and health professionals. With all stakeholders, we are seeking to build their awareness of CMRTO's regulatory role, providing them with useful and timely information so that it is apparent that our processes are accessible and fair.

The CMRTO is well on its way to implementing its strategic plan. We have almost completed the operational plan for 2014, which focused on the development and implementation of a new communications strategy. Council will be considering the 2015 operational plan at its meeting in December 2014, and providing direction to staff. Council will also review the strategic plan annually and update it as necessary given developments internally and externally.

The 2014-2016 Strategic Plan concludes that, in developing the plan, the CMRTO has looked at and set a path to respond, within its legislated mandate to serve and protect the public interest, to a changing health care system, rapidly advancing technologies and increased expectations for greater collaboration, communications and transparency.

### **3. Refreshed website: [www.cmrto.org](http://www.cmrto.org)**

In June 2014, CMRTO Council approved a new communications strategy for the next three years. The work related to the revised communications strategy started with updating the CMRTO website. The refreshed website was released on September 23, 2014.

The new website has been developed and designed using current technologies and best practices in website communication. The user interface is clean and simple, and more 'visitor-friendly'. The home page has large buttons which navigate the website based on user type, including 'public', 'members', 'applicants' and 'employers'. There is a large 'what's new' section on the home page, which provides quick access to the latest information on the CMRTO's activities, Ministry announcements, and reports.

The website has enhanced search capabilities, and has been developed to ensure that information is easily accessible. In addition to other essential information relating to the regulation of medical radiation technologists, such as the public register, the standards of practice, the code of ethics, practice guidelines, legislation, regulations and by-laws, the CMRTO website contains the following elements:

- the role of Council and statutory and non-statutory committees, including their constitution, functions and a description of their processes as set out in legislation
- the CMRTO's processes relating to registration assessments for applicants and related fees for these assessments
- the CMRTO's processes relating to making new, amending or revoking by-laws and regulations
- the notices of Council meetings, the meeting agenda and Council highlights
- the process to file complaints and mandatory reports including the name and contact information for the Director of Professional Conduct
- the reports CMRTO submits to government and agencies including: the annual report to the Minister of Health and Long-Term Care, the annual fair registration practices report and other reports to the Ontario Fairness Commissioner, submissions to the Health Professions Regulatory Advisory Council, and other reports
- the CMRTO Strategic Plan 2014-2016: Commitment to Excellence
- the names of non-members who have been found guilty of practising medical radiation technology illegally

In addition, the CMRTO website has links to public service announcements made by the Federation of Health Regulatory Colleges of Ontario (FHRCO). By using public information created by FHRCO, CMRTO can be sure of a consistent approach to the information provided by Colleges to the public on the role of a health regulatory College, and the information about the type and quality of care they might expect. The public service announcements created by FHRCO are an excellent example of the health regulatory colleges collaborating to ensure that the public is better informed. The CMRTO provides specific information on the role of medical radiation technologists within the health care system.

#### **4. New communications strategy – first phase**

As part of the new communications strategy approved by Council in June 2014, the CMRTO is expanding the information provided to the public and members electronically. The CMRTO engaged the services of a recognized expert in the area of communications with the public and social media, to provide guidance in the development of the new communications strategy.

All the CMRTO publications including the standards of practice, the code of ethics, practice guidelines, the quality assurance program, and the newsletter *Insights*, are available on the CMRTO website. Over the next few years, CMRTO will be phasing out its print newsletter, and replacing it with more frequent updates in the 'what's new' section of the website which will be emailed to members and subscribers.

## **B. Transparency initiatives underway**

The following initiatives to strengthen the existing measures that the CMRTO has in place to enhance transparency, are currently underway.

### **1. Internal review of regulatory processes**

As part of the CMRTO's 2014 operational plan, the CMRTO's Director of Professional Conduct has been conducting an internal review of the College's regulatory processes, using criteria from two other recent reviews of health regulatory colleges: the PriceWaterHouse Coopers review of the College of Denturists of Ontario, and the voluntary review of the Royal College of Dental Surgeons of Ontario completed by the independent regulatory expert, Harry Cayton, and the Professional Standards Authority for Health and Social Care. It is planned that the findings of the internal review will be presented to Council at its meeting in March 2015.

A component of the CMRTO internal review includes a transparency review. The preliminary findings of the transparency component of the internal review will be presented to Council at its meeting in December 2014 for its consideration.

### **2. Review of transparency principles developed by the Advisory Group on Regulatory Excellence**

The CMRTO Council has been kept informed of the work on transparency that has been done by the Advisory Group on Regulatory Excellence (AGRE). At a future meeting in the first quarter of 2015, the CMRTO Council will review the final transparency principles developed by AGRE and shared through FHRCO, and determine whether to use this decision framework when applying transparency principles to their work.

### **3. 2015 Operational Plan**

The CMRTO Council will be reviewing and approving its 2015 operational plan based on the strategic and enabling goals set out in the 2014-2016 Strategic Plan. The operational plan will include resources and initiatives to support the work already underway to support its legislated mandate to serve and protect the public interest, within a changing health care system, rapidly advancing technologies and increased expectations for greater collaboration, communications and transparency.

#### **4. Communications strategy – second phase**

The next phase of the new communication strategy is underway and includes a social media component. CMRTO released its corporate Facebook page in October 2014. We will be adding other social media strategies such as Twitter, You Tube and blogs over the next few months.

In addition, we will continue to review and refine the refreshed CMRTO website to ensure that we are providing easily accessible information that is understandable, clear and relevant to the public.

### **C. Future transparency initiatives**

#### **1. 2014-2016 Strategic Plan**

The CMRTO will continue to implement its strategic plan. Council will be considering the 2015 operational plan at its meeting in December 2014, and providing direction to staff. Council will also review the strategic plan annually and update it as necessary given developments internally and externally.

#### **2. Implementing new transparency and regulatory initiatives**

Once the CMRTO Council has had an opportunity to consider the AGRE transparency framework, and the findings and recommendations of the CMRTO internal review of its regulatory processes, the Council will consider the new transparency initiatives to implement. The initiatives they may consider include:

- whether there is particular information on MRTs contained in the CMRTO register that should be made accessible in other areas of the CMRTO website
- whether to expand the member information on the public register through by-law amendments
- whether to provide additional information regarding Council meetings on the CMRTO website
- whether to provide additional information about any of the CMRTO's processes on the CMRTO website
- other recommendations and findings

Any proposed changes to the information provided on the public register will require amendments to the CMRTO by-law governing the public register, and as such, would be circulated to members and stakeholders for comment prior to Council enacting any such amendments.

#### **3. Communications strategy**

In addition to providing easily accessible information that is understandable, clear and relevant to the public, the CMRTO will develop new strategies to reach new audiences such as students, educators and managers of medical radiation technologists. It is important that managers in the workplace settings understand the role and responsibilities of their MRT employees in providing competent, safe and effective medical radiation technology services to their patients.

In conclusion, the CMRTO would like to thank the staff of the Health Human Resources Strategy Division in providing further information and context on the request. The CMRTO is pleased to work with the Ministry on these important issues of public significance, and is committed to meeting the expectation of increasing awareness and understanding of the role of the CMRTO through communications with the public and MRTs.

If you have any questions regarding this report, do not hesitate to contact Linda Gough, Registrar at 416.975.4353 or [lgough@cmrto.org](mailto:lgough@cmrto.org).

Sincerely,

A handwritten signature in black ink that reads "Donna D. Lewis". The signature is written in a cursive style with a large, looped initial "D" for "Donna".

Donna D. Lewis, MRT(T)  
President