



CMTO's Language Fluency Policy Review Background and Rationale

Policy revised December 7, 2015 for implementation February 1, 2016

The demonstration of reasonable fluency in English or French is a requirement for registration as a Registered Massage Therapist (RMT) with the College of Massage Therapists of Ontario (CMTO).

Communication forms the basis for safe and effective Massage Therapy care. RMTs must be able to communicate effectively with their clients as well as with other healthcare professionals involved in their clients' care. They must also be able to communicate with the College, as being able to understand and implement College materials related to registration, quality assurance, complaints and discipline is an essential part of an RMT's accountability as a regulated health professional.

Language Policy Review

In June 2015, CMTO undertook a review of the Language Fluency Policy that was implemented in July of 2014. The review had two objectives:

- To verify whether or not the currently required CLB levels are valid descriptors of the language levels needed at entry to practice for the profession (listening 8, reading 8, speaking 8, writing 7); and
- To explore strengthening and clarifying that policy.

There was also concern that some Ontario-educated Massage Therapy graduates were experiencing difficulties communicating in English during the Objectively Structured Clinical Evaluation (OSCE) examination, and that the Language Fluency Policy, as written, was not entirely effective in identifying language fluency for registration.

CMTO engaged the Touchstone Institute to carry out the policy review. Touchstone researchers undertook a number of activities to complete the review and develop recommendations for the College, including:

- Background research;
- An electronic survey of all approved Massage Therapy programs in Ontario;

- Two focus groups with key Massage Therapy stakeholders (10 participants in all), including subject matter experts, examination assessors, peer reviewers, and past and present CMTO Registration Committee members;
- Interviews with several key stakeholder representatives; and
- A review of available standardized language tests in both English and French.

Validating CMTO's Language Benchmarks

As noted above, one of the goals of the review was to verify whether or not the currently required CLB levels are valid descriptors of the language levels needed at entry to practice for the profession.

A review of the policies of other Ontario health regulators revealed that CMTO's required fluency levels are within a similar range to those required by other health regulators. In addition, the results of the electronic survey that was sent to all approved Massage Therapy programs in Ontario showed that, of the 18 programs that responded, the majority (14 respondents) indicated that the CLB levels required in the 2014 CMTO language fluency policy are at the appropriate level.

A more in-depth discussion of the CLB levels required for entry to practice was held with stakeholders who attended two focus group sessions. During the sessions, participants worked with the facilitator to identify all of the language activities and associated skills that are part of the daily professional practice of Massage Therapists, and considered how these related to the descriptors of the current CLB required scores. Participants were also provided with descriptors of the CLB levels immediately higher and lower than those indicated in the CMTO policy for them to have a basis for comparison. At the conclusion of these exercises, all 10 focus group participants agreed and confirmed that the current required CLB levels are at the appropriate level for entry to practice to the Massage Therapy profession.

In addition to the focus groups, four telephone interviews were undertaken with key stakeholders. The discussions focused on each stakeholder's experience and observations of the language fluency requirements of Massage Therapy practice, CMTO's 2014 Language Fluency Policy, and the appropriateness of the CLB levels required in that policy. Overall, these stakeholders were in agreement that the current levels are appropriate.

Considerations for a Revised Policy

Following the extensive research and consultation described above, Touchstone researchers identified the following issues to be addressed in a revised policy:

- Acceptance of completion of an approved Massage Therapy program in Ontario has proved to be insufficient evidence, in some cases, of English or French language fluency. This became apparent to the College as some Ontario-educated Massage Therapy graduates experienced difficulties communicating in English during the OSCE examination.
- The CLB levels required by the College for Massage Therapy entry to practice appear to be appropriate.
- Having a policy that only accepts two tests, the Michener English Language Assessment (MELA) and the Canadian Language Benchmarks Placement Test (CLBPT), is quite limiting for applicants.

These tests are only available in Canada (the MELA only in Ontario), with limited frequency and some restrictions on how often one can repeat them.

- The CLBPT is a placement test designed to determine placement of newcomers into English as a Second Language courses. Eligible immigrants may only take the CLBPT once every six months. The reliability and validity of the results have not been validated for professional registration.
- While the 2014 Language Fluency Policy references the acceptance of evidence of French language fluency, there were no tests listed as accepted for that purpose.
- The admission requirements and the curricula of Massage Therapy programs at Private Career Colleges (PCCs) and Colleges of Applied Arts and Technology (CAAT), particularly in the area of language and communications, are often different. While all CAAT programs have a minimum language fluency requirement for admissions and require courses in language and communications, only some PCCs have the same requirements.

Identifying Acceptable Language Proficiency Tests

The revised language proficiency policy needed a broader range of acceptable language tests, including tests that are already deemed as acceptable proof of fluency for entry into a CAAT or PCC. In order to be included in the revised policy, Touchstone recommended that the test:

- Be standardized and appropriate for high-stakes uses, as stated in the test purpose;
- Have sufficient psychometric analysis to support the claims of its reliability and validity for the regulatory sector;
- Be accessible to candidates, both in terms of test sites being available locally and/or worldwide, and in terms of price range;
- Have research to connect the test results to the CLB, so that a defensible connection might be made between the varied test results;
- Have precedent of its use within the regulatory sector; and
- Assess all four language skills and provide a score for each.

In 2015, three applicants for registration with CMTO submitted documentation indicating that they completed a single Grade 12 English course in Ontario as evidence of meeting the language fluency requirement. However, Grade 12 English courses are not specifically designed for the acquisition of English language skills, and evaluation in those courses is fundamentally different from what is measured in a test of language proficiency. This means that, while a candidate may pass an English course in Ontario, the resulting overall percentage grade they receive makes it difficult to ascertain whether or not they have achieved the required skill levels in reading, writing, listening and speaking, as the evaluation component of a Grade 12 English course does not meet the criteria noted above. As a result, completion of a Grade 12 English course is not acceptable proof of language proficiency.

Relating Test Results with the Established CLB Level

As noted above, the detailed analysis of the communicative tasks required of a Massage Therapist determined that the CLB language levels (of speaking 8, listening 8, reading 8, and writing 7) are appropriate levels of proficiency for safe and effective practice.

Identifying language proficiency tests that can be mapped onto these benchmark levels ensures that the standards are defensible. Several language assessment tests have been developed that are directly aligned with the levels of the CLB. Examples of these are the Canadian Language Benchmarks Placement Test (CLBPT), the Canadian English Language Benchmarks Assessment for Nurses (CELBAN), and the Michener English Language Assessment (MELA). Of these, only the MELA has been related to communication tasks in Massage Therapy.

Other international tests have been mapped to the CLB through research. In some instances, the research was conducted directly in reference to the CLB framework (i.e., IELTS, CanTEST), while in others there is a secondary relationship (i.e., iBT TOEFL).

CMTO's Revised Language Fluency Policy (Attached)

Taking into account the above-noted considerations, a draft policy was developed for the CMTO Council's review. This policy (attached) was approved by Council on December 7, 2015 for implementation February 1, 2016. The updated policy:

- Continues to allow those whose first and primary language is either English or French to meet the requirement by signing a self-declaration;
- Continues to allow those who completed their secondary school education in English or French to meet the requirement by signing a self-declaration, though in limited circumstances an applicant may be asked to provide verification from the secondary school;
- Promotes fairness and accessibility for applicants, by:
 - Including a greater number of acceptable tests, all of which test the four domains of language;
 - Selecting tests that are valid, objective and delivered in a secure manner;
 - Including several tests that applicants may complete outside of Canada;
 - Including tests in both official languages;
 - Including one test in each language (IELTS and TEF) that is also accepted by Citizenship and Immigration Canada for the purpose of immigration to Canada; and
 - Aligning the required scores as closely as possible to the identified CLB levels.
- Recognizes that applicants whose first language is not English or French may achieve language fluency through the completion of an Ontario Massage Therapy program that:
 - Has a minimum language fluency requirement for admission;
 - Includes the requirement that he or she pass at least two full (i.e. three credit or 30-hour) mandatory language and/or communications courses; and
 - Allows learners to improve their profession-specific skills through instruction and practise in English or French.
- Allows applicants to provide other compelling non-objective evidence of language fluency.