

### Consultation Report- Updates to CMTO's Registration Regulation

From February 10 – April 10, 2023, CMTO sought feedback on proposed amendments to its Registration Regulation. The first amendment was related to Bill 106, the *Pandemic and Emergency Preparedness Act, 2022*, which came into effect in April 2022 and requires all health regulatory colleges in Ontario to create an emergency class of registration for qualified practitioners. Colleges are to propose changes to their registration regulations in four areas:

1. Circumstances that will open the emergency class of registration.
2. Requirements for emergency registration.
3. How long an emergency certificate of registration is valid.
4. Moving from the emergency class to another class of registration.

The second amendment related to a proposal that CMTO circulated in 2015 for a change to its Registration Regulation to support accreditation of Massage Therapy education programs by the Canadian Massage Therapy Council for Accreditation. CMTO proposed adding a 30-month transition timeframe for programs seeking accredited status.

#### Consultation process

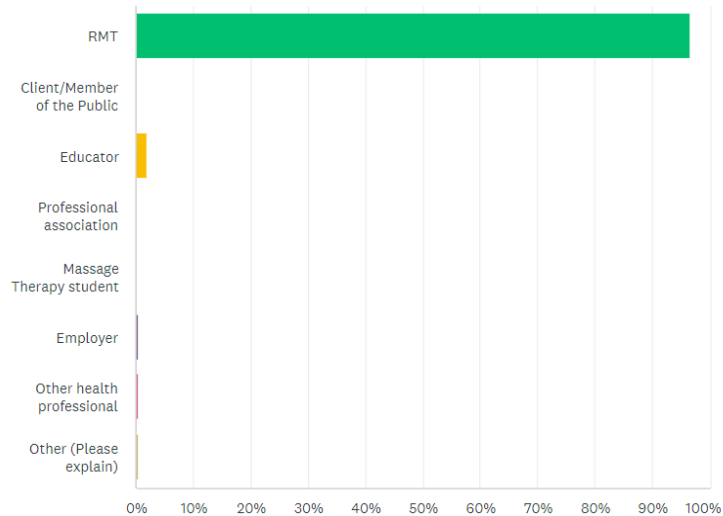
CMTO emailed all registrants and stakeholders [notice of the consultation](#) on February 10 and created a survey to collect feedback. There were 200 responses to the feedback survey and three (3) emails with feedback were received by the April 10 deadline. CMTO also heard from the Competition Bureau of Canada. [Read the Competition Bureau's letter](#).

#### What we heard

Of the 200 responses, 193 respondents identified as RMTs.

I am a/an:

Answered: 200 Skipped: 0



Below is a summary of feedback received on both proposals:

### Emergency Class of Registration

CMTO heard the following:

- The emergency class could be useful in preventing delays in registration during an emergency.
- The emergency class is unnecessary for RMTs.
- The emergency class has risk for RMTs and RMT business owners.
- Creating an emergency class could impact client safety.
- It is unfair for people with the same education to be subject to different registration requirements.
- There is concern about the creation of a two-tiered system with the addition of an emergency class.
- There is concern over extra fees resulting from the emergency class.
- There were concerns about the supervision of RMTs in the emergency class including:
  - What does supervision consist of?
  - How will supervision work?
  - What qualifications will supervisors have?
  - Will there be training for supervisors?
  - How will supervisors be paid/compensated?
  - What are the liability implications for supervising RMTs?
- How those in the emergency class obtain will professional liability insurance.
- There is no need to increase registrant numbers.
- The OSCE or some sort of evaluation should still be required for those in the emergency class because what happens when the “emergency” is over?

- People are worried about having safeguards in place for when people move from the emergency class to the General Class.
- There should be training and practice requirements for the emergency class.
- Questions about how the transition to General Class would work and whether people would have to meet requirements after an emergency.
- CMTO should be able to monitor, evaluate and make changes to the emergency classes as needed.

Respondents didn't have a clear idea about what the emergency class is because comments were raised as to:

- Why it was being introduced.
- What would constitute an emergency.
- Who is eligible for the emergency class and who will qualify for the emergency class in terms of practice hours.

### **Accreditation – 30 Month Transition Period**

There was a variety of feedback on the 30-month transition period for education programs. Some responses centered around the 30-month transition period not making sense or being unnecessary, accreditation seeming complicated and expensive, and Massage Therapy already being overregulated. Feedback on whether the length of time was appropriate varied. Comments also included that this should have been implemented a few years ago and that this is a positive step towards reducing cases of sexual abuse and fraud.

Specifically, educators provided the following feedback on the 30-month transition period:

- Who will be responsible for ensuring that programs are complaint?
- Has CMTO considered the responsibility for approving a program, and will this be an endorsement of a program?
- Has the approval process been shared with stakeholders?
- The changes were not communicated to schools.
- What are roles of CMTO, the MCU and CTMTCA up to and after the 30-month transition period?
- The implications of what this means for schools and students are vague.

### **Next Steps**

Council will consider feedback received at a special meeting on April 25, 2023. Proposed changes to the Registration Regulation must be submitted to the Ministry of Health for review by May 1, 2023.