

College of MASSAGE THERAPISTS of Ontario

2024 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

Under section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2024.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

2. Organization information

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| Organization name | College of MASSAGE THERAPISTS of Ontario |
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3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of MASSAGE THERAPISTS of Ontario

Licensing requirements (brief description for each requirement listed):

| Profession/ Trade Name | Massage Therapist |
|-------------------------------|---|
| Academic requirement | Diploma in Massage Therapy from a recognized Massage Therapy education program. |
| Experience requirement | N/A |
| Language requirement | Applicants for registration must be able to speak and write either English or French with reasonable fluency. Applicants meet |

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| | <p>this requirement in the following ways: 1. Signing a self-declaration indicating that their first and primary language is English or French 2. Signing a self-declaration indicating that their secondary school education was completed in English or French 3. Provide test results from an approved standardized language fluency test demonstrating that they have achieved the minimum scores determined by the College 4. Provide evidence in the form of an original transcript from a recognized Massage Therapy education program that has a minimum language fluency requirement for admission, and the original transcript shows successful completion of at least two full (e.g. 3-credit or 30-hour) mandatory courses in English, French or health-related communications or 5. Provide the College other compelling evidence of language fluency. This could be, for example, evidence that the applicant completed a university degree in English or French.</p> |
| <p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p> | <p>Applicants must successfully complete the two Certification examinations: the written Multiple-Choice Question (MCQ) exam; and the practical Objectively Structured Clinical Evaluation (OSCE) https://www.cmtto.com/become-an-rmt/apply-for-registration/certification-examinations/ Applicants are also required to complete CMTO's Jurisprudence Program https://www.cmtto.com/become-an-rmt/online-jurisprudence-program/ Applicants must demonstrate up-to-date education both at the time the</p> |

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| | <p>Certification Examinations are completed and at the time they submit an application for registration (as required by the Registration Regulation). An applicant who graduated more than three years prior to their exam date, or more than three years prior to applying for registration, must complete a Refresher Course.</p> <p>https://www.cmtto.com/policies/education-requirement-for-exam-eligibility-and-initial-registration/</p> <p>https://www.cmtto.com/policies/refresher-course/ At the time of submitting an application for registration an applicant must submit the following documents: - Vulnerable Sector Check - Transcript from Massage Therapy education program - Proof of CPR and First Aid - Proof of professional liability insurance - Government-issued ID confirming authority to practice in Canada - Headshot photo The requirement to submit the above listed documents is not a new requirement. It was not added to this section in the previous reports because CMTO had focused on reporting legislative requirements whereas these are policy requirements.</p> |
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4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

| Organization name | Function |
|--------------------------|-------------------------|
| Prometric | OSCE / Skill based exam |
| Prometric | Knowledge based exam |

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of MASSAGE THERAPISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

Prometric uses internationally recognized testing standards, designed to ensure validity, fairness, and defensibility. The certification examinations are developed by Subject-Matter Experts (SMEs), all of whom are Registered Massage Therapists registered in Ontario. The exams also undergo rigorous psychometric review. The minimum passing score for the MCQ examination is established by a panel of SMEs based upon considerations such as the relevance of each question to competent practice, the difficulty of each question, and the ability of the question to differentiate between the competent and non-competent candidate at the entry-to-practice level. The score a candidate receives on the OSCE is based on the candidate's performance in each station as evaluated by Massage Therapist examiners who are trained to apply established standard and objective marking criteria. Candidates for both MCQ and OSCE are notified by email within six to eight weeks following the exam date regarding their exam results. However, for candidates who take the OSCE in May, June and July, result notifications take longer as Prometric requires a critical mass of candidate results to determine the cut score.

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

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| 1 | <p>CMTO Jurisprudence Program: CMTO’s Jurisprudence Program was made mandatory for all applicants effective January 1, 2024. The online program is offered on-demand and free of charge and focuses on topics such legislation and regulation, the prevention of sexual abuse and Standards of Practice and professionalism and the code of ethics. The goal of the Jurisprudence Program is to ensure that all new registrants have a solid foundation of the regulatory requirements all RMTs must comply with, particularly those that impact the safety and efficacy of client care.</p> |
| 2 | <p>Massage Therapy Education and Credential Assessment (MTECA) process updated: The MTECA process assesses the education of applicants who either graduated from a Canadian Massage Therapy program outside of Ontario and the program is not accredited by the Canadian Massage Therapy Council for Accreditation (CMTCA) or the applicant was educated in Massage Therapy outside of Canada. Previously, the MTECA review focused on an applicant’s Massage Therapy education, including any relevant professional development course(s) completed. The updated MTECA program now includes the following: 1. Education Assessment: The education assessment continues to be based on the Practice Competencies and Performance Indicators (PCs/PIs), however it is now conducted by a CMTCA Assessor. The education assessment now includes an interview component so the CMTCA Assessor can connect with the Applicant, and the Applicant has an opportunity to provide more information about their education credentials. Once the paper-based assessment and Applicant interview are completed, the CMTCA Assessor writes a report of their findings for the Registration Committee. 2. Standards of Practice Review: The Standards and Regulations e-Workshop has been replaced by a Semi-Structured Interview (SSI) focusing on CMTO’s Standards of Practice. The SSI is modelled on the process used in CMTO’s quality assurance program with minor modifications to make it appropriate for individuals who are not currently practising. The SSI will be conducted by one of CMTO’s experienced Assessment Advisors. Once the interview is complete, the Assessment Advisor writes a report of their findings for the Registration Committee. 3. The Registration Committee Decision: The Committee has two reports to consider when determining the equivalence of an Applicant’s education: the Education Assessment Report and the Semi-structured Interview Report. MTECA Program updates have been added to CMTO's website.</p> |

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| 3 | <p>Language Fluency Policy updated The following updates were made to CMTO’s Language Fluency Policy in March 2024: 1. Language was updated to be gender neutral and inclusive 2. Pearson Test of English (PTE) was added as an approved assessment as mandated by Immigration, Refugees, and Citizenship Canada’s (IRCC) 3. Updated and added scores for the Test d’évaluation de français pour le Canada (TEF Canada) 4. The International English Language Testing System (IELTS)IELTS’s One Skill Retake, providing individuals the option to retake any one area of the test if their score requires improvement was added to the policy The updates ensure that the policy keeps up with third-party changes and is complete, accurate and inclusive. It is also ensures that applicants whose first language is not English or French do not experience unnecessary delays in the application process. By recognizing tests accepted for the purposes of immigration, some applicants may find that they do not need to complete another language test, saving them time and money prior to registration with CMTO.</p> |
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B. Risks and Mitigations

| Risk | Mitigation Measure |
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| <p>Massage Therapy Education and Credential Assessment (MTECA) • MTECA has been in place since 2017 without a review. • The education assessment component of MTECA was conducted by a Subject Matter Expert (SME) from the Certification Examinations who would develop a report of their assessment for review by the Registration Committee. CMTO transitioned the certification exams to Prometric and no longer has a direct connection to examination SMEs to conduct the education assessment for MTECA. • CMTO no longer offers the Standards and Regulations e-Workshop that an individual that doing the MTECA assessment would have to complete. • There was also the risk that education</p> | <ul style="list-style-type: none"> • The education assessment is now conducted by a CMTCA assessor. In addition to the paper-based review, the education assessment includes an interview component so the CMTCA Assessor can connect with the Applicant, and the Applicant has an opportunity to provide more information about their education credentials. the CMTCA Assessor then writes a report of their findings for the Registration Committee. • The Standards and Regulations e-Workshop has been replaced by a Semi-structured Interview (SSI) focusing on CMTO’s Standards of Practice. The SSI will be conducted by one of CMTO’s experienced assessment advisors. Once the interview is complete, the |

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| <p>programs may use the MTECA process to seek approval from CMTO without becoming accredited.</p> | <p>Assessment Advisor writes a report of their findings for the Registration Committee. • The Registration Committee now has two reports to consider when determining the equivalence of an Applicant’s education</p> <p>• The updated MTECA program is personalized to the Applicant and designed to assess new graduates as well as experienced Massage Therapists and will be valid and relevant to the current requirements.</p> |
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6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of MASSAGE THERAPISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

| Registration process | Changes Made (Yes / No) | Description |
|---|-------------------------|--|
| Registration requirements either through regulation, by-law or policy | Yes | Starting January 1, 2024, all applicants applying to become RMTs with CMTO are required to do the online CMTO Jurisprudence Program prior to submitting an application for registration. |
| New or consolidated class of certificates or licenses | Yes | Starting July 1, 2024, individuals registering for the first time with CMTO are able to register in the Inactive class of registration. |
| Assessment of qualifications, including competency-based | No | |

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| assessments and examinations | | |
| Documentation requirements for registration | No | |
| Timelines for registration, decisions and/or responses | No | |
| Registration and/or assessment fees | No | |
| Changes to internal review or appeal process | No | |
| Access by applicants to their records | No | |
| Other | Yes | Several updates were made by Prometric to the certification examinations including: - All OSCE station criteria points were reviewed to ensure they are fair and reliable - The health history form that was used in the 'Client Health History Interview' station has been replaced by a bulleted list of health history findings on the station instructions - OSCE score reports were updated and candidates receive more specific information about how they performed in each content area, and in which OSCE station(s) each content area is tested. - Change was also made to how candidate performance on the OSCE is reported to educators. Educators will now see how their graduates performed in each of the competency areas, rather than in each of the stations - Prometric developed a new |

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| | | form for candidates to report an issue or a concern that arises during their OSCE. |
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B. Training, policy and applicant supports

| Registration process | Changes Made (Yes / No) | Description |
|---|--------------------------------|---|
| Training and resources for staff who deal with registration issues | Yes | In July 2024, staff at the Coordinator level had an in-person learning session to discuss and share key skills and techniques that could be used to demonstrate to interested parties (i.e. applicants and registrants) that their concerns/inquiries are listened to and addressed. |
| Resources or training to support applicants to move through the licensing process | Yes | The Candidate Handbook for certification examinations was streamlined to make it user friendly. Candidates can access two sets of sample MCQ Questions, posted free of charge, on CMTO's website. The Initial Registration Guide, document checklist and fee document are updated on an annual basis. |
| Anti-racism and inclusion-based policies and practices | Yes | Our practice is to update policies using gender neutral language. |

C. System partners

| Registration process | Changes Made (Yes / No) | Description |
|---|--------------------------------|---|
| Steps to increase accountability of third-party service provider(s) | Yes | CMTO continues to receive exam statistical reports from Prometric on a quarterly basis. These reports are reviewed by the Registration Committee as part of the Committee's exam oversight obligations. Prometric provides CMTO with an annual Executive Business |

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| | | Review, which includes an overview of operations, test development updates, improvements and future consideration for the following exam year. The agreement between CMTO and Prometric was modified in 2024 to include the addition of wording that requires Prometric to consult with CMTO before making amendments to the exam fee schedule and to seek approval from CMTO before using Artificial Intelligence (AI) for exam development, administration, reporting or analysis. |
| Accreditation of educational programs | Yes | The Updated Registration Regulation that became effective on July 1, 2024 gave CMTO the authority to approve programs for the purposes of registration as of January 1, 2027. CMTO's Registration Committee, or a body approved by them, will have the authority to approve Massage Therapy education programs for the purposes of registration with CMTO. This authority comes into effect on Jan 1, 2027, 30 months after the updated regulation came into effect. CMTO will be approving programs that are accredited by the Canadian Massage Therapy Council for Accreditation (CMTCA). CMTO added an accreditation page on the website including information related to as timelines, impact to schools and students, how to obtain accreditation, etc. https://www.cmtc.ca/wp-content/uploads/2024/09/Accreditation-of-Massage-Therapy-Education-Final.pdf |
| Mutual recognition agreements | No | |

D. Responsiveness to changes in the regulatory environment

| Registration process | Changes Made (Yes / No) | Description |
|--|--------------------------------|---|
| Emergency registration plans | Yes | In September 2024, CMTO conducted a consultation with Massage Therapy educational institution requesting feedback on the draft policy for Supervision of Emergency Class Registrants. |
| Technological or digital improvements | Yes | Information on the website was reviewed and the online processes and forms were updated to ensure compliance with the implementation of registration regulation updates effective July 1, 2024. Exam candidates are now able to access OSCE and MCQ scores through a secure portal instead of receiving the results by email. |
| Steps to address labour shortages in the profession or trade | No | |

7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator’s membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

| | Race-based data collected? (Yes or No) |
|---------|---|
| Members | No |

| | |
|------------|----|
| Applicants | No |
|------------|----|

Additional description:

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B. Other identity-based or demographic data collected

| | Other identity-based or demographic data collected? (Yes or No) |
|------------|--|
| Members | No |
| Applicants | No |

Additional description:

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C. Languages of service provision

College of MASSAGE THERAPISTS of Ontario makes application materials and information available to applicants in the following languages.

| Language | Yes / No |
|------------------------|---|
| English | Yes |
| French | Yes |
| Other (please specify) | A French language page is available on the CMTO website with access to some documents in French https://www.cmto.com/en-francais/ |

D. Membership Profile

| Profession Name | Total Number of Members |
|------------------------|--------------------------------|
| Massage Therapist | 16193 |

| Class of License | Total Number of Members | Number of Internationally Educated Members |
|--------------------------------------|--------------------------------|---|
| Full / General/ Independent Practice | 15556 | 13 |
| Inactive Certificate | 637 | 1 |

| Gender | Number of Members |
|---|--------------------------|
| Male | 3655 |
| Female | 12503 |
| X (includes trans, non-binary, and two-spirit people) | 35 |
| Other / not collected | 0 |

| Jurisdiction of Initial Training | Number of Members |
|---|--------------------------|
| Ontario | 16014 |
| Other provinces and territories | 165 |
| Other International | 14 |
| Multiple Jurisdictions | 0 |
| Other/not collected | 0 |
| United States | 0 |

| Country of Initial Training | Number of Members |
|------------------------------------|--------------------------|
| Czechia | 1 |
| Poland | 5 |
| Germany | 3 |
| Romania | 1 |
| Israel | 1 |
| Japan | 2 |
| Netherlands | 1 |

| | |
|--------|-------|
| Canada | 16179 |
|--------|-------|

| Official language of preference | Number of Members |
|---------------------------------|-------------------|
| English | 16150 |
| French | 43 |

| Racial identity (optional) | Number of Members |
|----------------------------|-------------------|
| Not collected | 16193 |

E. Data Notes

CMTO does not collect racial identity information from registrants.

F. Applicant Profile

| Profession Name | Total Number of Applicants |
|-------------------|----------------------------|
| Massage Therapist | 1023 |

| Gender | Number of Applicants |
|---|----------------------|
| Male | 246 |
| Female | 768 |
| X (includes trans, non-binary, and two-spirit people) | 9 |

| Jurisdiction of Initial Training | Applications received in 2024 | Applications with decisions pending (in progress at end of reporting year) |
|---|--------------------------------------|---|
| Ontario | 1011 | 8 |
| Other provinces and territories | 12 | 0 |
| United States | 0 | 0 |
| Other International | 0 | 0 |
| Multiple Jurisdictions | 0 | 0 |
| Other/not collected | 0 | 0 |

| Country of Initial Training | Number of Applicants |
|------------------------------------|-----------------------------|
| Canada | 1023 |

| Official language of preference | Number of Applicants |
|--|-----------------------------|
| English | 1022 |
| French | 1 |

| Racial identity (optional) | Number of Applicants |
|-----------------------------------|-----------------------------|
| Not collected | 1023 |

G. Data Notes

CMTO does not collect racial identity information from applicants. CMTO received 1023 new applications for registration between January 1 to December 31, 2024. 8 applications were pending approval at the end of 2024.

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2024. Some applications may have been received in the previous year.

| Jurisdiction of initial training | Successful | Unsuccessful | Withdrawn |
|----------------------------------|------------|--------------|-----------|
| Ontario | 1011 | | |
| Other provinces and territories | 12 | | |
| United States | | | |
| Other International | | | |
| Multiple Jurisdictions | | | |
| Other/not collected | | | |

I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

| Class of registration | Total new registrants | Number of internationally educated registrants |
|--------------------------------------|-----------------------|--|
| Full / General/ Independent Practice | 1021 | 0 |
| Inactive | 2 | 0 |

J. Data Notes

1023 applicants were granted registration in 2024. This includes 8 applications submitted in 2023 that were approved in 2024 and 1015 applications received in 2024 that were approved in 2024.

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

| Jurisdiction of initial training | Number of internal reviews and appeals processed | Number of decisions changed following internal review or appeal |
|----------------------------------|--|---|
| | | |

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

| Jurisdiction of initial training | Number of applicants who sought external review or appeal | Number of decisions changed following external review or appeal |
|----------------------------------|---|---|
| | | |

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

| Issue or reason raised | Number of appeals |
|------------------------|-------------------|
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Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

| Reason for not registering | Number of internationally trained applicants |
|----------------------------|--|
| | |

L. Data Notes

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| N/A |
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Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.