

College of MASSAGE THERAPISTS of Ontario

2025 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, 2025.

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

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.

<p>Experience requirement</p>	<p>N/A</p>
<p>Language requirement</p>	<p>Applicants for registration must be able to speak and write either English or French with reasonable fluency. Applicants meet 4 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.cmta.com/become-anrmt/apply-for-registration/certificationexaminations/ Applicants are also required to complete CMTA's Jurisprudence Program https://www.cmta.com/become-anrmt/online-jurisprudence-program/ Applicants must demonstrate up-to-date education both at the time the 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</p>

	<p>exam date, or more than three years prior to applying for registration, must complete a Refresher Course. https://www.cmta.com/policies/educationrequirement-for-exam-eligibility-andinitial-registration/ https://www.cmta.com/policies/refreshercourse/ 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>

4. Third party assessments

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

Organization name	Function
Canadian Massage Council for Accreditation (CMTCA)	Academic credential evaluation
Prometric	Knowledge based exam
Prometric	OSCE / Skill 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 - Prometric adheres to internationally recognized testing standards to ensure exam validity, fairness, and defensibility. Certification examinations are developed by Registered Massage Therapist Subject-Matter Experts(SME) and are subject to rigorous psychometric review. The MCQ passing score is set by an SME panel based on question relevance to competent practice, difficulty, and ability to distinguish between competent and non-competent entry-level candidates. OSCE scores are based on candidate performance at each station, evaluated by trained Massage Therapist examiners using standardized, objective marking criteria. Results for both MCQ and OSCE exams are typically released by email within six to eight weeks; however, OSCE results from May, June, and July may take longer as a sufficient number of candidates is required to establish the cut score.

CMTCA - CMTO entered into an agreement with CMTCA to assess the curriculum of Massage Therapy programs completed by applicants who graduated from programs not recognized by CMTO. This agreement ensures that educational assessments are conducted in a fair, consistent, and transparent manner, and are completed within a defined process and timeline.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Update to the Language Fluency Policy CMTO's Language Fluency Policy provides five pathways for individuals whose first language is not English or French to meet the policy requirement. Of the five pathways in the policy, option four, known as the "Education Pathway" included the completion of a Massage Therapy diploma program that has: o A language requirement for admission, AND o At least 2 mandatory communication courses in the Massage Therapy program curriculum; the courses must be approved by CMTO to ensure they are focused on foundational communication skills and/or the healthcare context. This 'Education Pathway' relies on a meaningful admission requirement focused on language proficiency. The
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	<p>previous version of the policy had no guidance in that regard. As of March 3, 2025, the 'Education Pathway' of the Language Fluency Policy was updated to specify that the language requirement for admission must be: o English or French as a first and primary language, o Completion of high-school in English or French (minimum of three years' education required; completion of a single high-school course is not accepted), or o A third-party language assessment that evaluates reading, writing, listening and speaking. Massage Therapy programs that choose to support their students in meeting the language fluency requirement using the Education Pathway must comply with the admission requirement options above and complete a Compliance Form confirming how they meet the Education Pathway. The Compliance Form is required to be completed annually. This policy update is not retroactive; a graduate whose education met the policy requirements in place at the time they graduated is not affected by the update. CMTO believes that these policy updates and implementation plan provide assurance that applicants using the Education Pathway meet the language fluency requirement, while maintaining all five options in the Language Fluency Policy</p>
2	<p>CMTO Student Guide CMTO developed the Student Guide (January 2025) to help Massage Therapy students clearly understand what it means to become a Registered Massage Therapist in Ontario. Rather than waiting until registration, the guide meets students early in their journey and explains in plain, practical terms the expectations, responsibilities, and behaviours required of regulated health professionals. The guide walks students through the registration process, emphasizes the importance of honesty and professionalism, and outlines areas of risk such as practising before registration, professional boundaries, sexual abuse prevention, and billing practices. By using real-life examples, the guide helps students see how everyday decisions, both inside and outside the classroom, can affect their ability to become registered and their future careers. www.cmtto.com/wp-content/uploads/2025/02/CMTO-Student-Guide.pdf</p>
3	<p>Update to the Vulnerable Sector Check Policy The Vulnerable Sector (VS) Check policy was updated to align with updated submission processes for applicants who are provided an electronic/digital VS Check, and for applicants who are unable to obtain a VS Check at the time of application. The process was updated to accept VS Checks in the form it is received by the applicant from their police service. Prior to the amendment, the VS Check policy included outdated information that was applicable during COVID-19 and</p>

	specific to only Toronto and Ottawa applicants. Amendments to this section of the policy now provides additional details regarding the process for any applicant who is unable to obtain a VS Check at the time of application.
4	Progress on Equity, Diversity and Inclusion (EDI) In 2025, CMTO’s EDI Committee: • Developed CMTO’s first EDI strategy for approval by the Board • Key registration policies are being reviewed by the EDI Committee using six equity lenses tied to the EDI strategy including: - Language Accessibility - Financial Resilience - Professionalization - Supportive and Guiding (vs. Policing) - Improving our Member and Public Journey - Cultural Sensitivity and Bias Reduction The EDI Committee reviewed the VS Check and Language Fluency policies with the above equity lenses to develop guidance and recommendations for policy updates.

B. Risks and Mitigations

Risk	Mitigation Measure
Exam Accommodations	The non-standard accommodations process was updated to include a phone/video call to set up and confirm specific accommodations. An example of a non-standard accommodations could include a candidate requiring an ASL interpreter, while a standard accommodation could include a candidate requiring a private room. CMTO and Prometric have implemented a process whereby, if a candidate requests a non-standard accommodation such as ASL interpretation, Prometric’s operations team will meet with the candidate in advance to understand their specific needs. Prometric reviewed the exam to ensure questions would not disadvantage the candidate when being interpreted.

6. Changes to registration practices

During the January 1 to December 31, 2025 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
Timelines for registration, decisions and/or responses	No	
Changes to internal review or appeal process	No	
Assessment of qualifications, including competency-based assessments and examinations	No	
Registration requirements either through regulation, by-law or policy	No	
Documentation requirements for registration	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Anti-racism and inclusion-based policies and practices	Yes	While the Equity Diversity and Inclusion (EDI) committee reviewed the VS Check and Language Fluency policies in 2025, implementation of updates to those policies took place in 2026.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third parties	No	
Mutual recognition agreements	No	
Accreditation of educational programs	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Steps to address labour issues (minister/stakeholders consultations, check demand-supply gap, etc)	No	
Other	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:

CMTO has begun the foundational work required to complete a comprehensive demographic survey of registrants with the goal of implementing the survey in 2027

B. Other identity-based or demographic data collected

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

Additional description:

CMTO has begun the foundational work required to complete a comprehensive demographic survey of registrants with the goal of implementing the survey in 2027

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)	

D. Membership Profile

Profession Name	Total Number of Members
Massage Therapist	16860

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	16216	11
Inactive Certificate	644	0

Gender	Number of Members
Male	3817
Female	13005
X (includes trans, non-binary, and two-spirit people)	38

Jurisdiction of Initial Training	Number of Members
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Ontario	16719
Other provinces and territories	129
United States	1
Other International	10
Other/not collected	1

Country of Initial Training	Number of Members
China	1
Japan	2
Germany	2
Israel	1
Netherlands	1
New Zealand	1
Switzerland	1
Ukraine	1
Canada	16848
Other Countries	1
United States of America	1

Official language of preference	Number of Members
English	16818
French	42

Racial identity (optional)	Number of Members
Not collected	16860

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Massage Therapist	1058

Gender	Number of Applicants
Male	264
Female	791
X (includes trans, non-binary, and two-spirit people)	3

Jurisdiction of Initial Training	Number of Applicants
Ontario	1045
Other provinces and territories	13

Country of Initial Training	Number of Applicants
Canada	1058

Official language of preference	Number of Applicants
English	1058

Racial identity (optional)	Number of Applicants
Not collected	1058

G. Data Notes

CMTO has begun the foundational work required to complete a comprehensive demographic survey of registrants with the goal of implementing the survey in 2027.

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2025. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	1035	8	2
Other provinces and territories	12	0	1

Applications with decisions pending

The table below summarizes the inventory of applications in progress as of December 31, 2025. Again, some of these applications may have been received in the previous year.

Jurisdiction of initial training	Incomplete	Complete	Total
Ontario	4	1041	1045
Other provinces and territories	0	13	13

I. New Registrants

For the 2025 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 Inactive Class	1043 4	0 0

J. Data Notes

In 2025 CMTO received 1058 applications for registration. 1047 applications were approved and granted registration. 1 application was refused registration 4 applications were incomplete, of the four, fee was refunded for 3 applications while 1 application remained incomplete at year end 3 applications were withdrawn 3 applications were pending a review by the Registrar and or Registration Committee

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
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Ontario	1	0
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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
Ontario	0	0

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

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

In 2025, one application was reviewed by a panel of the CMTO Registration Committee and a refuse to register decision was issued by the panel.

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.