

# College of CHIROPODISTS of Ontario

## 2024 Fair Registration Practices Report

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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

<b>Organization name</b>	College of CHIROPODISTS 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 CHIROPODISTS of Ontario

Licensing requirements (brief description for each requirement listed):

<b>Profession/ Trade Name</b>	Chiropodist
<b>Academic requirement</b>	Currently, the following educational designations are the only ones recognized by the College: B Tech Pod – Baccalaureus Technologiae Podiatry B. Pod. – Bachelor of Podiatry B.Sc Pod – Bachelor of Science Podiatry D.Ch. – Diploma in Chiropody D.P.M. – Doctor of Podiatric Medicine D.Pod.M. –

	<p>Diploma in Podiatric Medicine An applicant must possess a diploma or degree from an approved program and is one of the educational designations listed. Applicants from non-approved programs must submit their academic information to the College for an evaluation that will be conducted by a third party. A report will be prepared for consideration by the College. The College will consider the academic evaluation report principally in connection with the criteria found in s. 4(1) 1 of the Registration Regulation which says: "The applicant must have successfully completed a post-secondary program approved by the Council whose curriculum includes courses in health sciences, chiropodial sciences, humanities and clinical education that, in the opinion of the Council, are relevant to the scope of practice of the profession." In addition, applicants must have engaged in clinical practice for a total of at least 3 months during the two years immediately preceding the date of application.</p>
<p><b>Experience requirement</b></p>	<p>Applicants must have engaged in clinical practice for a total of 3 months during the two years immediately preceding the date of application.</p>
<p><b>Language requirement</b></p>	<p>Applicants must be able to speak and write either English or French with reasonable fluency. The College defines "language proficiency" as the ability to communicate and</p>

	<p>comprehend effectively, both orally and in writing, in either English or French. You can demonstrate language proficiency through education, registration status (previous registration with the College or in another Canadian jurisdiction), language proficiency testing or experience. Applicants can meet the language proficiency requirement by achieving the minimum scores for one of the following tests: CELPIP (General) International English Language Testing System (IELTS): General and academic training versions Test d'évaluation de français (TEF) Test de connaissance du français pour le Canada (TCF) Pearson Test of English (PTE) Applicants must achieve test scores for all test components during one complete attempt of the test. If necessary, applicants can re-take tests, in full, to demonstrate language proficiency.</p>
<p><b>Additional information on licensing requirements (may include links to appropriate page on regulator website):</b></p>	<p>Since July 1993, the Ontario Ministry of Health's legislative restrictions prevent individuals holding a Doctor of Podiatric Medicine (D.P.M.) from registering as podiatrists in the province. These D.P.M. degree holders may only register as chiropodists and must operate within the more limited scope of chiropody practice.</p>

## 4. Third party assessments

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

<b>Organization name</b>	<b>Function</b>
Martek	Knowledge based exam
World Education Services	Academic credential evaluation
World Education Services	Prior learning and recognition
Martek	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 CHIROPODISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

A dedicated Registration Examination Committee oversees all aspects of the College's qualifying exams, from development to implementation. To ensure the highest standards, the Committee collaborates with Martek Assessments Ltd, a respected Canadian firm that specializes in professional assessment services. While Committee members bring their deep knowledge of chiropody sciences to the table, Martek's consultants contribute their expertise in technical aspects like exam construction, item development, and blueprint design.

## 5. Accomplishments, risks and mitigations

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

### A. Accomplishments

1	In a significant step forward, the College's Council successfully returned to in-person registration examinations in 2024, marking the end of the temporary virtual testing measures implemented during the pandemic.
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## B. Risks and Mitigations

Risk	Mitigation Measure
<p>The current legislative restriction on DPM registration as podiatrists in Ontario has several documented impacts on healthcare delivery. Data shows that foot care services are particularly limited in remote, rural, and northern Ontario regions. This access limitation affects preventative and regular foot care service availability across the province. The restriction has influenced professional development in two ways: it has affected the progression of foot care services in Ontario and impacted recruitment into both chiropody and podiatry fields. Statistical analysis indicates Ontario's foot care provider numbers are below comparable jurisdictions. Current records show fewer than 850 registered practitioners, while population-based comparisons suggest a need for more than 3000 practitioners to adequately serve Ontario's current population size and demographic composition. In areas with limited access to foot care providers, certain populations face increased healthcare challenges. These include elderly individuals and those managing chronic conditions such as diabetes. The scarcity of registered providers in these regions can result in delayed or absent care for these groups. Research indicates that delayed foot care can lead to medical complications. These may include</p>	<p>A comprehensive approach to addressing Ontario's footcare specialist shortage includes several potential policy adjustments. These adjustments could focus on both increasing provider numbers and expanding service delivery capabilities. The current legislative restriction on DPM registration could be reviewed to evaluate opportunities for qualified footcare specialists to practice, particularly in Ontario's underserved and remote areas. Certification and licensure processes might be streamlined for practitioners from other regions. This could include assessment of qualification equivalency standards and development of transition programs for practitioners from other jurisdictions. Scope of practice considerations could align with other Canadian jurisdictions' full-scope podiatry models. This alignment would involve evaluation of advanced procedures, medication prescribing authority, and diagnostic tool utilization parameters. Integration with primary healthcare systems presents opportunities for enhanced patient care coordination. This systematic approach could support regular foot health monitoring within routine medical assessments. Educational capacity could be expanded through additional training programs and</p>

<p>infections, ulcer development, and in some cases, amputation. These outcomes affect both individual health outcomes and healthcare system resources. Current data from underserved regions demonstrates the relationship between provider availability and access to essential foot health services. Population health data suggests that increasing the number of registered providers could expand healthcare coverage in underserved areas. This expansion could potentially reduce preventable foot-related complications and support broader public health objectives.</p>	<p>institutional partnerships. Resource allocation strategies might include educational incentives for practitioners willing to serve in areas with identified service gaps. Continuing education frameworks could ensure practitioners maintain current knowledge of field developments and treatment methodologies.</p>
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## 6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of CHIROPODISTS 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

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
<p>Registration requirements either through regulation, by-law or policy</p>	<p>Yes</p>	<p>In 2023, the College amended the following registration policies, which were approved by Council in January 2024: Registration Examination Failures Registration Examination Accommodation Registration Examination Process, Procedures, and Appeals Returning to Practice</p>

New or consolidated class of certificates or licenses	No	
Assessment of qualifications, including competency-based assessments and examinations	Yes	The Exam bank and OSCEs are reviewed and updated annually. In addition, the College's Council successfully returned to in-person registration examinations in 2024, marking the end of the temporary virtual testing measures implemented during the pandemic.
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	No	

**B. Training, policy and applicant supports**

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
Training and resources for staff who deal with registration issues	Yes	Staff training is provided on all matters related to registration, including applicants, registration exam, and renewal.

Resources or training to support applicants to move through the licensing process	No	
Anti-racism and inclusion-based policies and practices	Yes	An optional and anonymous EDI survey was introduced during the annual renewal process in 2023. The survey was offered again in 2024. Results of survey may impact future registration policies.

**C. System partners**

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
Steps to increase accountability of third-party service provider(s)	Yes	The College maintains robust oversight of third-party service providers through several key mechanisms. For our examination services, we have established a structured communication framework with Martek Assessments, our psychometric partner. This includes regular performance reviews, ongoing dialogue about quality assurance, and prompt attention to any emerging concerns. Our accountability measures include: Scheduled performance evaluations to ensure examination standards are consistently met Direct channels for immediate issue resolution Continuous monitoring of service delivery quality Regular collaborative meetings to review processes and outcomes Documentation of all concerns and their resolutions This proactive approach to vendor management ensures high standards are maintained in our examination processes while

		supporting transparent and effective service delivery.
Accreditation of educational programs	Yes	The current landscape of educational programs for foot care practitioners in Ontario presents several areas for development: The Michener Institute offers the province's sole chiropody training program, which currently operates without formal accreditation. This limited educational capacity impacts the profession's ability to meet growing healthcare demands. Assessment of provincial healthcare needs indicates that additional post-secondary institutions, particularly offering podiatry programs, are essential to address Ontario's foot care requirements. Data suggests that northern regions, which experience higher rates of lower limb amputations, would especially benefit from localized training programs. The establishment of additional educational programs, particularly in northern Ontario, could strategically address both the geographic distribution of practitioners and the specific healthcare challenges faced in these communities.
Mutual recognition agreements	No	

**D. Responsiveness to changes in the regulatory environment**

<b>Registration process</b>	<b>Changes Made (Yes / No)</b>	<b>Description</b>
Emergency registration plans	Yes	Implementation of the Emergency Class Registration regulation, and the College's policy to provide an emergency class certificate of registration.

Technological or digital improvements	Yes	The College is implementing a significant technological advancement through the modernization of its registration database system. This multi-phase migration to cloud-based infrastructure began in 2023 and represents a planned three-year implementation strategy. The project progressed throughout 2024 and is scheduled for completion in 2025. This strategic upgrade will enhance data management capabilities, improve system reliability, and provide enhanced security features. The cloud-based platform will support more efficient registration processes while ensuring robust data protection standards are maintained.
Steps to address labour shortages in the profession or trade	Yes	Engaging with the Ministry of Health, Council of Chiefs of Ontario, Ontario Society of Chiropractors, Ontario Podiatry Medical Association and other stakeholders, to advocate for the Full-Scope Podiatry Model to address shortages of footcare specialists in Ontario. The College has also met with Algoma University because of its mission to educate the northern Ontario communities as well as NOSM about the possibility of a joint podiatry program between Algoma and NOSM.

## 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

	<b>Race-based data collected? (Yes or No)</b>
Members	Yes
Applicants	No

Additional description:

The College conducts an optional, anonymous demographic survey during Annual renewal to gather important data about our profession, including race-based information. This data collection helps inform our policies and standards while providing valuable insights into our registrant demographics across Ontario. By understanding our practitioners' diverse backgrounds and language capabilities, we can better evaluate healthcare accessibility for different communities. This information helps identify potential gaps in service delivery and areas where certain populations may face barriers to accessing culturally appropriate foot care. The data supports our mission to ensure all Ontarians can access care from practitioners who understand their cultural context and can communicate effectively in their preferred language.

## B. Other identity-based or demographic data collected

	<b>Other identity-based or demographic data collected? (Yes or No)</b>
Members	Yes
Applicants	No

Additional description:

The College collects demographic data through an optional, anonymous survey during Annual Renewal, which includes questions about racial identity. This information is vital for assessing how effectively we serve historically underserved

communities and helps us evaluate whether our registrant demographics reflect the diverse healthcare needs of Ontario's population.

### C. Languages of service provision

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

Language	Yes / No
English	Yes
French	No
Other (please specify)	

### D. Membership Profile

Profession Name	Total Number of Members
Chiroprapist	796

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	796	66

Gender	Number of Members
Male	335
Female	460
X (includes trans, non-binary, and two-spirit people)	1

<b>Jurisdiction of Initial Training</b>	<b>Number of Members</b>
Ontario	725
United States	23
Other provinces and territories	5
Other International	43

<b>Country of Initial Training</b>	<b>Number of Members</b>
Canada	730
United States of America	23
United Kingdom	33
Australia	5
South Africa	4
Spain	1

<b>Official language of preference</b>	<b>Number of Members</b>
English	796

<b>Racial identity (optional)</b>	<b>Number of Members</b>
Not collected	796

## **E. Data Notes**

The College regulates chiropodists and podiatrists. Please find the registration data for Podiatrists (separate from the above data for Chiropodists):

- Total registered Podiatrists: 37
- Educational background: All internationally educated
- Gender distribution: 35 male, 2 female
- Primary language: English (all registrants)
- Training jurisdiction: United States (all registrants)
- Race-based data is not collected during registration

Please note:

- No new Podiatrist

registrations were processed during this period due to the Ministry of Health's 1993 legislative ban on Podiatrist registration in Ontario

### F. Applicant Profile

Profession Name	Total Number of Applicants
Chiroprapist	43

Gender	Number of Applicants
Male	17
Female	25
X (includes trans, non-binary, and two-spirit people)	1

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario	40	
Other provinces and territories	2	
Other International	1	

Country of Initial Training	Number of Applicants
United Kingdom	1
Canada	42

Official language of preference	Number of Applicants
English	43

Racial identity (optional)	Number of Applicants
Not collected	43

### G. Data Notes

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### 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	38	5	
Other provinces and territories			
Other International		1	

### 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	38	0

## J. Data Notes

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## 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
Other International	1	0

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

Other International	0	0
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**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
1. Equating international education to meet requirements to practice to full scope in Ontario	1

**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
1. Education not equivalent to minimum standards of the College	1

## L. Data Notes

The "appeal" above is actually a review by the Registration Committee for an international applicant from the UK. In order to determine eligibility of the applicant to write the College's Registration Exams, the education of the applicant is compared by an external 3rd party assessor to determine its

equivalence to the Chiropody program at the Michener Institute in Ontario (the only educational institution that trains Chiropodists in Ontario).

## 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.