



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

April 30, 2025

Ms. Allison Henry, Director

Health Workforce Regulatory Oversight Branch, Ministry of Health
10th Floor, 438 University Ave, Toronto ON M7A 1N3

Transmitted by email to allison.henry@ontario.ca and online via
<https://www.ontariocanada.com/registry/mail.do?action=displayComment>

Re: MOH Regulatory Registry Proposal 25-HLTC005

Overview of “As of Right” Submissions to the Ministry of Health (MOH) from College of Chiropodists of Ontario

The College of Chiropodists of Ontario supports the proposed “As of Right” regulatory amendments in the government’s efforts to build a more prosperous and resilient Ontario.

The College makes the following recommendations in addition to the amendments proposed:

- 1) The current ban on registering Doctors of Podiatric Medicine (DPM) as Podiatrists in Ontario since 1993 must be lifted to permit the unrestricted registration of DPM Podiatrists from other provinces. The College takes the position that it is antithetical to the proposed amendments and the spirit of labour mobility to continue to prevent the regulator from registering DPM Podiatrists in the Podiatrist class, particularly when there is a shortage of trained footcare specialists in the province. If As of Right legislation applies to Chiropodists, it must also apply to DPM Podiatrists and there is no justification for not including both classes of registrants of this College.
- 2) Any As of Right practitioners wishing to practice in Ontario from another Canadian jurisdiction, must be employed by either a community health centre, hospital or a private chiropody or podiatry practice only where the owner/operator of the practice is a registrant in good standing of the College. Any As of Right practitioner must be restricted to employment in one private practice throughout the entirety of the period during which they are not a registrant of the College, to a maximum of 6 months.
- 3) Further, any registrant employing an As of Right practitioner must notify the College within 30 days of hiring the As of Right practitioner, providing the name, province of origin, length of anticipated employment and confirmation of good standing with the As of Right practitioner’s regulatory authority in their province of origin.



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

- 4) Any As of Right practitioner must carry the requisite professional liability insurance or the registrant employer must carry sufficient professional liability insurance coverage for the As of Right practitioner. The registrant employer must provide proof of valid professional liability insurance upon notifying the College of their intention to employ an As of Right practitioner.
- 5) Any As of Right practitioner must register with the College within 6 months of the date of their first day of employment in Ontario. Any applicant must successfully pass the College's jurisprudence examination.

Consideration Should Be Given to US licensed DPM Podiatrists:

In addition, the College would like to take this opportunity to make submissions respecting the expansion of the As of Right amendments for US licensed nurses and doctors. In particular, the College requests that similar considerations be given to US trained DPM Podiatrists. The College takes the view that, given that there are many DPM Podiatry programs in the US and, in addition, that many Canadians, including Ontarians are enrolled in such programs, the As of Right amendments in respect of Chiropodists and DPM Podiatrists should include recognition of US licensed DPM Podiatrists. Doing so will greatly alleviate the considerable shortage of highly trained footcare specialists in the province. Furthermore, the provinces in Canada currently regulating DPM Podiatrists, namely BC, Alberta and Quebec, all recognize US Board certified DPM Podiatrists as meeting their registration requirements. Including this amendment to the proposed As of Right amendments for Chiropodists and Podiatrists therefore makes sense and fosters greater labour mobility among the Canadian provinces that already recognize US licensed DPM Podiatrists. The College should retain the right to deny registration where an As of Right US applicant does not meet the good character expectations of the College.

National Support for the Removal of the Ban on Registering DPM Podiatrists:

The College includes letters of support from the following national footcare regulators:

- College of Podiatric Physicians of Alberta (See Attached)
- College of Physicians and Surgeons of Nova Scotia (See Attached)
- The College of Podiatrists of Manitoba (See Attached)

Having hosted a national conference of footcare regulators in early April 2025, the College is unaware of any opposition to the removal of the ban in Ontario preventing the registration of DPM Podiatrists.



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

CONSIDERATIONS

The Ministry has posed seven questions to regulators and is asking for feedback by Wednesday April 30, 2025. The College's responses are provided below.

Current Registration Processes:

- 1. What challenges currently exist with the registration process for health professionals regulated in another province or territory, and for U.S registered physicians and nurses?***
 - In most of Canada and around the world, foot care specialists are called Podiatrists. These medical professionals complete a Doctor of Podiatric Medicine (DPM) degree - a four-year medical program - followed by 1-3 years of residency training in the United States. Their extensive education allows them to diagnose conditions and perform surgical procedures on the soft tissue structures and bones of the foot and ankle.
 - Ontario, however, has created a unique and unnecessarily complex situation by the imposition of a ban on registering DPM Podiatrists since 1993. While the province recognizes two types of foot specialists: Podiatrists and Chiropodists, the regulator is only permitted to register Chiropodists regardless of the education and qualifications of an applicant. Chiropodists typically hold a three-year post-graduate certificate with an undergraduate degree in science-related studies and have a more limited scope of practice compared to DPM Podiatrists.
 - The *Chiropody Act*'s 1993 ban on registering new podiatrists in Ontario has created a significant barrier for qualified DPM Podiatrists from other regions seeking to practice in the province. These highly trained footcare specialists must register as Chiropodists to practice in Ontario, forcing them to accept a reduced scope of practice that fails to utilize their advanced medical training and expertise. In essence, despite the *Labour Mobility Act* and the provisions around Labour Mobility as captured in the RHPA, DPM Podiatrists have not been permitted true labour mobility because of the ban in 1993. Furthermore, Ontario-based DPM Podiatrists face more practice restrictions than their counterparts in BC, Alberta, and Quebec. Despite the absence of any public protection rationale for banning DPM Podiatrists, and clear evidence that Ontarians would benefit from increased access to foot care specialists with an expanded scope of practice, Ontario continues to prevent DPM Podiatrist from practicing to their full skill, knowledge and judgment in Ontario.



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

Patient Safety and Quality of Care:

2. *What are the positive impacts to patient safety or the quality of care provided to patients in Ontario with each of the four proposals?*

- By removing these inter-provincial registration barriers, Ontario can dramatically improve public healthcare access and quality by attracting more trained footcare specialists to the province. Fully trained DPM Podiatrists would be able to perform more complex diagnostic procedures, conduct advanced surgical interventions, and provide specialized care for high-risk patient groups, particularly those with diabetes-related foot complications. The province would benefit from increased medical expertise, reduced wait times for specialized foot care, and more comprehensive treatment options that can help prevent serious health issues like amputations.
- The ability to attract Chiropodists and DPM Podiatrists from other jurisdictions would also help to address the distinct health human resource shortage of footcare specialists in Ontario. Both Chiropodists and DPM Podiatrists are regulated in other Canadian jurisdictions and there is no sound public protection basis for Ontario to restrict its registration to Chiropodists. The ban on registering DPM Podiatrists has contributed to the health human resource shortage in Ontario.
- The economic and systemic benefits of this approach are substantial. Enabling out-of-province DPM Podiatrists to practice at their full capability will help to reduce long-term healthcare costs by improving early detection and intervention for foot-related medical conditions. This will result in greater mobility among Ontarians for longer allowing for higher rates of aging in place. Moreover, this approach would align Ontario's healthcare practices with national standards, create a more flexible healthcare workforce, and ultimately provide Ontarians with access to the most advanced and comprehensive foot healthcare available. By modernizing registration requirements, the province can transform its approach to foot care specialization, prioritizing patient outcomes and professional excellence.

3. *Are there any risks to patient safety or the quality of care with each of the four proposals? How could these risks be mitigated?*

- The proposed legislative changes introduce two primary risks to patient safety and care quality. First, a provision allowing practitioners to begin practicing without registration for six months creates a significant regulatory blind spot, potentially exposing patients to unverified practitioners whose credentials, professional conduct history, and competence have not been thoroughly assessed or vetted by the College. This gap in oversight could compromise patient safety by permitting practitioners to operate without complete professional validation,



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

potentially allowing individuals with problematic professional backgrounds to practice unscrutinized.

- The second critical risk emerges from labour mobility provisions that could enable practitioners who have failed Ontario's rigorous registration examinations to re-enter the province through alternative, less strenuous provincial registrations. By using "As of Right" provisions, these individuals might circumvent Ontario's traditionally high professional standards, which are designed to ensure the highest quality of patient care. This pathway could potentially introduce practitioners who have not demonstrated the province's required level of competence, thereby undermining the fundamental purpose of comprehensive professional examinations.

To mitigate these risks, the legislation should include specific safeguards as follows:

- First, an explicit exception should be carved out preventing any individual who has previously failed Ontario's registration examinations from utilizing labour mobility provisions to gain registration.
- Second, the College must be assured that only private practice clinics owned and operated by registrants of the College may employ "As of Right" Chiropodists or DPM Podiatrists.
- Third, the College must preserve its ability to independently assess professional competence through practice assessments, including "As of Right" Chiropodists and DPM Podiatrists. These measures would maintain Ontario's high professional standards, protect patient safety, and ensure that practitioners meet the province's rigorous requirements, while still facilitating more flexible inter-provincial professional mobility.

Benefits and Risks:

4. What are the benefits for patients and health professionals associated with each of the four proposals?

- ***Initiative 1: Expanding the "As of Right" Registration***

By broadening the list of health professionals covered under "As of Right" rules, the initiative directly addresses critical healthcare workforce shortages in the province. Patients gain improved access to care through a more diverse and expansive pool of qualified healthcare professionals. These professionals were specifically identified based on demonstrated needs, ensuring that the expansion is strategically aligned with existing healthcare gaps. However, in Ontario there is a critical shortage of both Chiropodists and DPM



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

Podiatrists such that the As of Right amendments should apply to both professions.

- ***Initiative 2: Broadening Practice Settings***

This initiative significantly enhances healthcare accessibility by allowing professionals from Initiative 1 to practice across a wider range of healthcare settings. Recognizing that most primary care occurs outside hospitals and long-term care homes, the proposal removes unnecessary practice restrictions. Many of the identified health professionals traditionally operate in community and private practice settings, making this expansion critical for maintaining and improving patient care continuity.

- ***Initiative 3:*** This initiative doesn't have a direct impact on Chiropodists or Podiatrist as it currently doesn't apply to either profession. However, the College views any removal of barriers to entry for well trained, competent healthcare providers, including Chiropodists and DPM Podiatrists, balanced against risk of harm, to be a benefit to Ontarians.

- ***Initiative 4: Streamlining Inter-Provincial Registration***

The proposal to allow out-of-province health professionals to use their existing provincial or territorial licenses reduces administrative barriers and financial burdens for healthcare practitioners. By eliminating redundant registration processes, the initiative creates a more efficient pathway for professionals to provide care in Ontario. This approach not only supports health professionals by reducing their administrative and financial overhead but also indirectly benefits patients by facilitating easier movement of qualified healthcare providers across provincial boundaries.

5. *Are there any additional risks with these proposals that you would like to highlight?*

- ***Initiative 1: No Significant Risks Identified***

The expansion of health professionals eligible for "As of Right" registration appears to present minimal risk to patient safety or healthcare quality. The proposed changes appear to be carefully considered, based on the previous known experience of the four original health professions to adopt "As of Right" legislation and targeted to address existing professional workforce needs.

However, there is a notable risk in not including DPM Podiatrists in the As of Right expansion. First, failing to remove the ban is a detriment to Ontarians in that Ontario will continue to be



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

viewed as a less than desirable location to practice for DPM Podiatrists who currently must be registered as Chiropodists. Second, the failure to expand the As of Right professionals to include DPM Podiatrists does not reflect the spirit of the amendments which is to facilitate labour mobility for healthcare professionals nationally and to build a more prosperous and resilient Ontario.

- ***Initiative 2: Significant Patient Safety Concerns***

The proposal to remove practice site restrictions introduces risks to public safety. While hospitals and long-term care facilities have robust systems to verify professional credentials, the unrestricted expansion of practice settings creates a dangerous regulatory vacuum particularly if such practitioners elect to serve in underserved communities where there may be little direct oversight. Without comprehensive oversight mechanisms, there are no effective barriers preventing unqualified or potentially harmful practitioners from establishing private practices that could put patients at risk.

Currently a non-registrant of the College of Chiropodists may employ registrants of the College to provide footcare to patients. The College recommends that both Chiropodists and DPM Podiatrists be permitted to practice to their respective scopes of practice in hospitals, community health clinics and private practices where the owner/operator of the clinic is a registrant of the College.

- ***Initiative 4: Critical Interprovincial Registration Risks***

The automatic recognition of inter-provincial registrations presents multiple risks:

First, inconsistent entry-to-practice standards across provinces create potential loopholes for professional registration.

Second, variations in professional misconduct standards and reporting mechanisms mean that a health professional disciplined in one jurisdiction might not face equivalent scrutiny when seeking registration in Ontario. This creates a systemic risk where practitioners with problematic professional histories could circumvent robust screening processes.

Third, quality assurance and ongoing professional oversight vary widely between provinces. While Ontario maintains rigorous annual requirements for professional registrants, other jurisdictions may have significantly less stringent continuing education or competency verification processes.



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

These disparities could ultimately undermine the fundamental purpose of professional regulation: protecting public health and ensuring consistently high-quality healthcare across all practice settings.

Implementation:

6. *What implementation considerations or supports should the ministry be aware of for each of the four proposals?*

- ***Podiatry Registration Reform***

The existing ban on registering podiatrists in Ontario, established by the *Chiropody Act*, 1991, represents a significant barrier to accessing high-quality foot care. DPM Podiatrists from provinces like British Columbia, Alberta and Quebec, who have completed comprehensive surgical residencies in the United States, are currently unable to register with an equivalent certificate of registration in Ontario. In contrast, they must register as Chiropodists with limited practice scopes despite the education and demonstrated competency to practice to the DPM podiatry scope in other Canadian and American jurisdictions. Removing this legislative barrier would enable Ontario to benefit from world-class foot care expertise, significantly improving patient care and leveraging the advanced training of these professionals.

The inclusion of DPM podiatry registrations with the newly proposed “As of Right” legislation would create more opportunities for bridging programs within Ontario for chiropodists wishing to expand their practices. The reason for this is that the removal of the ban prohibiting registration of DPM podiatrists will likely result in the development of Ontario-based post-secondary podiatry programs and greater opportunities for education and training in the field in Ontario.

- ***Maintaining Rigorous Entry-to-Practice Standards***

The College currently requires labour mobility applicants to complete a written Jurisprudence examination, administered biannually in June and October. This examination should be maintained as a critical entry-to-practice requirement under the new “As of Right” legislation. By preserving this assessment, the ministry can ensure that all incoming health professionals demonstrate a comprehensive understanding of Ontario's professional standards, regulatory environment, and legal frameworks.



COLLEGE OF CHIROPODISTS OF ONTARIO
Regulating Chiropodists and Podiatrists in Ontario

- ***Preventing Registration of Previously Unsuccessful Applicants***

To protect patient safety and maintain high professional standards, applicants who have previously failed the College's examinations should be explicitly prohibited from practicing in Ontario. The new legislation must include clear provisions preventing automatic recognition of certificates for individuals who have previously failed to meet Ontario's rigorous professional qualification standards. This approach ensures that only fully qualified and competent professionals can provide healthcare services in the province.

7. What supports would regulated health professionals from another province or territory or U.S registered physicians and nurses need to help with the transition to practising in Ontario?

Maintaining the Jurisprudence examination requirement is crucial for supporting out-of-province health professionals transitioning to practice in Ontario. This examination serves as a critical orientation mechanism, ensuring that incoming professionals thoroughly understand Ontario's unique regulatory landscape, including specific Standards of Practice, professional Code of Ethics, and comprehensive regulatory frameworks. By requiring this examination, the province provides a structured pathway for professionals to acclimate to local professional expectations, ultimately enhancing patient safety and professional integration.

Nicole Zwiers LLB LLM
Registrar & CEO
College of Chiropractors of Ontario
180 Dundas Street West, Suite 1901,
Toronto, ON M5G 1Z8

April 16, 2025

Re: Removal of DPM limit in Ontario

Dear Ms Zwiers:

The need for highly trained foot care specialists across Canada is significant. The limitation on registration of Doctor's of Podiatric Medicine, in Ontario, restricts the mobility of Podiatrists into Ontario. Therefore, the College of Podiatric Physicians of Alberta supports the removal of the limitation of registration of Podiatrists with the Doctor of Podiatric Medicine (DPM) training/Degree. This change is consistent with both federal and provincial labor mobility legislation across Canada.

Regards,



Bradley Sonnema, DPM MSc. MBA FFPM Rcsp (glasg)



COLLEGE OF
PHYSICIANS & SURGEONS
OF NOVA SCOTIA

Administration

Suite 400 - 175 Western Parkway

Bedford, Nova Scotia

Canada B4B 0V1

Phone: (902) 422-5823 Toll-free: 1-877-282-7767

Fax: (902) 422-5035

E-mail : registration@cpsns.ns.ca

www.cpsns.ns.ca

April 29, 2025

Nicole Zwiers
Registrar & CEO
College of Chiropractors of Ontario
180 Dundas St. West, Suite 1901
Toronto, ON
M5G 1Z8

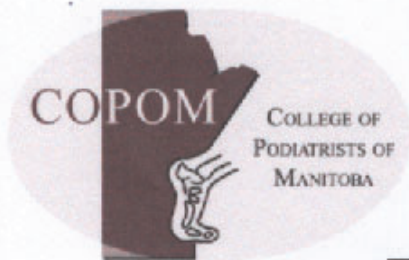
Dear Ms. Zwiers,

Re: Removal of Doctors of Podiatric Medicine Ban in Ontario

The College of Physicians and Surgeons of Nova Scotia (CPSNS) acknowledges the need for highly trained footcare specialists across Canada. Ontario's restriction on Doctors of Podiatric Medicine (DPMs) hampers recruitment. CPSNS supports your effort in removing this licensure limitation. This modification aligns with federal and provincial labour mobility laws throughout Canada.

Yours,

D.A. (Gus) Grant, AB, LLB, MD, CCFP, ICD.D
Registrar & CEO
College of Physicians and Surgeons of Nova Scotia



307-1661 PORTAGE AVE. WINNIPEG, MANITOBA R3J 3T7
www.copom.org

April 30, 2025

Nicole Zweirs LLB LLM
Registrar & CEO
College of Chiropodists of Ontario
180 Dundas Street West, Suite 1901,
Toronto, Ontario M5G 1Zb

Re: Removal of the DPM limit in Ontario

Dear Ms Zweirs:

As the population in Canada continues to age and the need for highly trained footcare specialists increases accordingly, the current restriction on the registration of Doctor's of Podiatric Medicine acts as a hindrance to the Ontario population in receiving this care. Therefore, at this time the College of Podiatrists of Manitoba supports the removal of the limitation of the registration of podiatrists with the DPM degree. This change in registration is consistent with current labour mobility practices across the country.

Yours Sincerely

Tracy-Joann Andrews, D.Pod.M, BSc.(Hons), MSc.
Registrar