

Office of the
fairness
commissioner

Bureau du
commissaire à
l'équité



Study of Registration Practices of the

COLLEGE OF CHIROPODISTS OF ONTARIO, 2007

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The Office of the Fairness Commissioner is an arm's-length agency of the Ontario government, established under the Fair Access to Regulated Professions Act, 2006. Its mandate is to ensure that certain regulated professions have registration practices that are transparent, objective, impartial and fair.

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1. INTRODUCTION

The Office of the Fairness Commissioner (OFC) undertook a study of registration practices of Ontario's regulated professions during the fall and winter of 2007–2008. The purpose of the study was to understand each regulated profession's 2007 registration practices and to establish baseline data and information to enable the OFC to measure progress as it fulfills its mandate under the Fair Access to Regulated Professions Act, 2006.

This report reflects the registration practices of the College of Chiropodists of Ontario as of December 31, 2007. Information in this report was gathered from

- face-to-face meetings with registration staff of the regulatory body
- additional documentation provided by the regulatory body
- relevant websites.

The College of Chiropodists of Ontario also provided registration information and statistics for 2005, 2006 and 2007 through a standard spreadsheet designed by the OFC.

An analysis and summary of the findings for all of the regulated professions are contained in the OFC's *Ontario's Regulated Professions: Report on the 2007 Study of Registration Practices*.

2. BACKGROUND OF THE REGULATORY BODY

A. Legislation

The College of Chiropodists of Ontario (COCOO) operates in accordance with the Chiropody Act, 1991, and the Regulated Health Professions Act, 1991. Its registration practices are governed by Ontario Regulation 830/93.

B. Protected Titles

The COCOO regulates chiropodists and podiatrists. As of July 1, 1993, and as designated in the Chiropody Act, 1991, new members registering with the college are required to be registered as chiropodists. However, those podiatrists who registered with the college before July 1, 1993, are permitted to continue to practise as podiatrists.

As of December 2007, the COCOO had 87 registrants registered as podiatrists (22 of whom practise in the United States) and 415 registrants registered as chiropodists.

C. Definition of the Profession

The scope of practice for both chiropodists and podiatrists is the assessment of the foot and the treatment and prevention of diseases, disorders or dysfunction of the foot by therapeutic, orthotic or palliative means. Chiropodists are authorized to prescribe drugs designated in the regulations, cut into the subcutaneous tissues of the foot, and administer by injection into the foot a substance designated in the regulations.

Podiatrists have the same authorized functions as chiropodists listed above, but they are also authorized to cut into the bony tissues of the forefoot and to communicate diagnoses.

D. Labour Market/Economic Trends

Registrants have few difficulties finding employment; and many out-of-province and out-of-country applicants have jobs waiting for them when they arrive. There may be a shortage of chiropodists and podiatrists in Ontario relative to the province's population.

E. New Developments within the Profession

Ontario's practice of registering chiropodists but not podiatrists makes it unique in North America. A person with a doctor of podiatric medicine (DPM) degree who is trained as a podiatrist may currently register in Ontario but only as a chiropodist, and is allowed to perform only the acts of a chiropodist authorized by the Chiropody Act, 1991. In Quebec, parts of western Canada, and most of the United States, the regulated profession is podiatry. Academic programs in the United States offer programs in podiatry, not chiropody.

The COCOO has written to the Minister of Health and Long-Term Care to ask that the province move from the chiropody model of foot care to the podiatry model. The minister has referred the matter to the Health Professions Regulatory Advisory Council (HPRAC) for review. This change to the podiatry model would make Ontario consistent with most other jurisdictions in North America.

F. Staffing

Staff consists of two full-time employees and one part-time employee. Two employees are involved in the registration process.

3. REGISTRATION PRACTICES

A. Registration Requirements and Application Process

i. Basic Requirements for Registration

To begin the application process for becoming registered as a chiropodist in Ontario, applicants must do all of the following:

- Submit completed application documents to the COCOO
- Pay a \$50 application fee
- Successfully complete a chiropody/podiatry program from an approved institution.
- Successfully complete the COCOO Registration Examination set or approved by the college's council
- Have completed three months of approved professional experience within the two years immediately preceding the date of the application
- Obtain Canadian citizenship or permanent resident status or be authorized under the Immigration and Refugee Protection Act to practise the profession in Canada.

ii. General Requirements for Application

The following are general requirements for a certificate of registration for any class of registrant with the college:

- The applicant must possess reasonable fluency in written and spoken English or French.
- The applicant must not have been found guilty of any criminal offence, an offence under the Narcotic Control Act or the Food and Drugs Act, or any other offence relevant to his or her suitability to practise chiropody.
- An applicant who has been registered or licensed in Ontario in another health profession or who has been registered or licensed in another jurisdiction in chiropody or another health profession must not have previously been or currently be the subject of a finding of professional misconduct, incompetence or incapacity.

iii. Classes of Registration

The registration regulation for the COCOO sets out three categories¹ of registration certificates: a General certificate, an Academic certificate and an Educational certificate.

A General certificate of registration permits the registrant, subject to any terms, conditions and limitations, to practise as a chiropodist under the Chiropody Act, 1991. The following are the requirements for a general certificate of registration:

1. The applicant must have successfully completed an approved post-secondary program whose curriculum includes courses in health sciences, chiropodial sciences, humanities and clinical education that are relevant to the scope of practice of the profession.
2. The applicant must have successfully completed the required Registration Examination set or approved by Council.
3. The applicant must have engaged in clinical practice for a total of at least three months during the two years immediately preceding the date of the application.
4. If the Registration Committee decides that the program the applicant has completed is deficient in one or more aspects, the applicant must give a written undertaking to the college to abide by any terms, conditions and limitations imposed by the committee on his or her certificate of registration until the applicant meets the educational requirements set by the committee.
5. The applicant must be a Canadian citizen or a permanent resident of Canada or be authorized under the Immigration and Refugee Protection Act to practise the profession in Canada.

Applicants for a General certificate of registration cannot be exempted from the requirements in paragraphs 1, 2 and 4 above.

If the Registration Committee decides that the applicant's program of study is deficient in one or more aspects, it will determine what the applicant must do to meet the educational requirements in paragraph 1 above.

¹ While Regulation 830/93 maintains these three separate categories of registration, at the time that the Study of Registration Practices was conducted the college had no members enrolled in the Academic and Educational categories.

An Academic certificate of registration may be granted to an applicant in the following circumstances:

1. The applicant must have successfully completed an approved post-secondary program whose curriculum includes courses in health sciences, chiropodial science, humanities and clinical education that are relevant to the scope of practice of the profession.
2. The applicant must have an appointment to the faculty of a post-secondary program in Ontario that meets the standards described in paragraph 1 above.
3. If the Registration Committee decides that the program the applicant has completed is deficient in one or more aspects, the applicant must give a written undertaking to the college to abide by any terms, conditions and limitations imposed by the committee on his or her certificate of registration until the applicant meets the educational requirements set by the committee.
4. The applicant must be a Canadian citizen or a permanent resident of Canada or be authorized under the Immigration and Refugee Protection Act to accept the appointment described in paragraph 2.

Applicants for an Academic certificate of registration cannot be exempted from the requirements in paragraphs 1, 2 and 3 above.

If the Registration Committee decides that the applicant's program of study is deficient in one or more aspects, it will determine what the applicant must do to meet the educational requirements in paragraph 1 above.

An Educational certificate of registration may be granted to an applicant who is either

1. Enrolled in Ontario in an approved post-secondary program whose curriculum includes courses in health sciences, chiropodial sciences, humanities and clinical education that are relevant to the scope of practice of the profession

or

2. Engaged in practice under the supervision of a member who holds a General or Academic certificate of registration in order to meet requirements imposed by the Registration Committee for qualification for a General certificate of registration.

An applicant for an Educational certificate must also be a Canadian citizen or a permanent resident of Canada, or be authorized under the Immigration and Refugee Protection Act to enrol in a course that meets the standards described in paragraph 1 above or to engage in the supervised practice referred to in paragraph 2.

Applicants for an Educational certificate of registration cannot be exempted from the requirement in paragraph 1 above.

B. Documentation Required from Internationally Trained Individuals

i. Standard Documentation

All candidates, including internationally trained individuals, are required to submit all of the following documents in support of their application:

- certification of three-month clinical experience/internship
- official transcript of successful completion of an approved chiropody/podiatry program
- official transcript of successful completion of other academic program(s)
- official evidence of registration with other licensing jurisdictions, if applicable
- complete résumé/curriculum vitae
- proof of Canadian citizenship or permanent resident status, or authorization under the Immigration and Refugee Protection Act to practise chiropody in Canada.

Transcripts must be sent directly from the educational institution to the college.

ii. Options for Applicants with Unavailable/Destroyed Documents

In circumstances where internationally trained persons do not have access to official documents, the college can contact overseas regulatory bodies to verify their admission to practice. It can arrange for photocopies of the official documents concerning registration status to be sent directly to the college. In the last five years the college has only once had to obtain such photocopies from another jurisdiction.

C. Credential Assessment (Third Party and/or Internal)

The COCOO does not employ the services of third-party credential assessors.

Under the Regulated Health Professions Act, the Registrar of the college can either register an applicant or refer the application to the Registration Committee. If an applicant has completed a

program at an institution assessed by the college as being equivalent to the Michener Institute for Applied Health Sciences² program, he or she will meet the necessary criteria for registration.

If the applicant's credentials are from a program not recognized as equivalent, the Registrar assesses the applicant's documentation. If the Registrar is unable to register the applicant, he or she is referred to the Registration Committee. If necessary, the committee will consult and work with the Michener Institute to evaluate the applicant's course of study.

The Registration Committee of the COCOO consists of one registered chiropodist/podiatrist, one representative from the Michener Institute, and two Order-in-Council public representatives. In addition, there may be a lawyer who sits as an adviser.

D. Academic/Program Requirements

To be registered with the COCOO the applicant must have attained a degree in the chiropody/podiatry program at the Michener Institute, or at one of the several international chiropody/podiatry programs that have been approved by the college. (See section 3.k below for details of international programs recognized as equivalent.)

E. Work Experience Requirements

The work experience requirement for domestic students is three months of practice supervised by a registered chiropodist/podiatrist and completed over the two-year period immediately preceding the beginning of the application process. The program from the Michener Institute contains a practical experience component that satisfies the college's requirement.

The work experience requirement for internationally trained individuals is the same as for domestically trained students and the work experience does not have to be obtained in Canada. Applicants coming from other jurisdictions may have obtained their practical experience after graduation; if not, they likely would have attained their practical requirements through their academic institution while they were still enrolled there.

F. Examinations

Upon having met the requirements for registration, the applicant is eligible to take the Registration Examination offered once a year in June. This examination is currently set and administered by the Michener Institute at its premises. However, because the COCOO is a small regulatory body (in

² The Michener Institute is the only post-secondary education program in Ontario that offers a course of study in chiropody. It graduates about 30 students a year and all of the graduates register with the college.

terms of the number of registrants) with a good working relationship with the Michener Institute, it is able to arrange for the Institute to administer exams at times other than June (typically in a winter session in December), if there is enough demand.

The COCOO provides an examination booklet to help applicants prepare. If an applicant requires extra help in preparing for the examination, the college is willing to work with the Michener Institute to arrange it.

An applicant who fails the Registration Examination is permitted to write a supplemental examination. If the applicant fails the supplemental examination, he or she must wait until the following year to retake the examination.

There are no exemptions from the Registration Examination under any circumstances.

The Registration Examination contains three parts:

Part A: Written Examination

This examination contains two sections, and the college determines which elements of Section A a candidate must sit. Both sections are a combination of multiple-choice, short-answer and essay questions.

Section A — Comprehensive Podiatric Medicine (including but not limited to biomechanics, sports medicine, high-risk foot, anatomy, pathophysiology, dermatology, local anaesthesia/soft tissue surgery, pharmacology, diagnostic imaging and laboratory testing, emergency medicine). Section A is 3.5 hours long.

Section B — Jurisprudence (administered by College of Chiropodists of Ontario). This examination is 1.5 hours long.

Part B: Objective Structural Clinical Evaluation

This is a standardized patient clinical evaluation that tests a wide variety of elements of clinical practice. Applicants attend at a number of stations where they complete a task and/or answer questions within a specified time.

Part C: Clinical and Oral Examination

This part consists of a three-hour clinical examination involving patient treatment and an oral examination based on the presenting patient. This part of the exam may be integrated with the Objective Structural Clinical Evaluation, but it is usually a separate component.

G. Language Requirements

Although the COCOO requires a reasonable fluency in written and spoken English or French, the college does not test for language skills. Exams must be completed in either English or French, and applicants who pass all parts of the examination are assumed to be reasonably fluent.

H. Fees

The fees shown below are reviewed and updated annually by the COCOO and are subject to change.

Application fee	\$50
Equivalency Assessment fee ³	\$250
Annual membership fee — General certificate of registration	\$950
Annual membership fee — Academic certificate of registration	\$950
Annual membership fee — Educational certificate of registration	\$100
Examination fee	\$400 ⁴
Initial incorporation fee	\$950
Annual incorporation renewal ⁵	\$475

I. Third Parties

Name of Third Party	Relationship to Regulatory Body
Michener Institute for Applied Health Sciences	Currently sets and administers the Registration Examination. Also assists the COCOO in evaluating the course of study of applicants from programs not approved by the college.

³ The equivalency assessment fee pertains only to applicants whose credentials were attained at an institution not approved by the COCOO.

⁴ The examination fee will soon be increasing to \$1000. The examination process is currently heavily subsidized by the COCOO.

⁵ There are tax advantages for members to incorporate; however, it is not mandatory to incorporate a practice.

J. Typical Length of the Registration Process

The length of the registration process depends on how long it takes for the applicant to meet the registration requirements. The time constraint for applicants is that the exam is usually administered only once a year, in June. Once the applicant has successfully met all of the requirements for registration and has paid the registration fee, he or she can be registered within a matter of days.

K. Accredited Programs

There are no accredited post-secondary education programs in Canada, and there is no accrediting body for the Michener Institute chiropody program. The following chiropody/podiatry programs have been approved by the COCOO:

Canada

The Michener Institute of Applied Health Sciences
Toronto

Australia

Queensland University of Technology
Brisbane

South Africa

Technikon Witwatersrand
School of Health Technology
Doornfontein

United Kingdom

Birmingham School of Podiatry
Birmingham

Durham School of Podiatric Medicine
Durham

Huddersfield School of Podiatry
Huddersfield

London Foot Hospital and School of Podiatric Medicine
London

Northampton School of Podiatry
Northampton

Plymouth School of Podiatry
Plymouth

University of Salford Department of Podiatry
Salford

University of Southampton Department of Podiatry
Southampton

University of Brighton Department of Podiatry
Eastbourne

Queen's University of Belfast
Northern Ireland School of Podiatric Medicine
Belfast

Queen Margaret College
Department of Podiatry
Edinburgh

Glasgow Caledonian University
Division of Podiatric Medicine and Surgery
Glasgow

University of Wales Institute Cardiff
Centre for Podiatric Studies
Cardiff

United States

(Colleges accredited by the Council on Podiatric Medical Education of the Podiatric Medical Association)

Barry University School of Graduate Medical Sciences
Miami Shores, FL

California College of Podiatric Medicine
Los Angeles, CA

Des Moines University
College of Podiatric Medicine
Des Moines, IA

Dr. William M. Scholl College of Podiatric Medicine
Chicago, IL

New York College of Podiatric Medicine
New York, NY

Ohio College of Podiatric Medicine
Independence, OH

Temple University School of Podiatric Medicine
Philadelphia, PA

L. Internal Review/Appeal Process

The Registration Committee of the COCOO handles reviews of registration decisions. The Registration Committee of the COCOO consists of one professional member, one academic representative from the Michener Institute and two public appointees. Appeals are handled by the Health Professions Appeal and Review Board (HPARB). The relationship of both the Registration Committee and HPARB to the decision-making body in the registration process is an arm's-length one.

Information concerning the review and appeal process is not currently available on the college's website.

4. BRIDGING PROGRAMS

The COCOO does not offer a bridging program for internationally trained individuals. However, the Michener Institute can create an individualized program for those who have been internationally trained.

5. MUTUAL RECOGNITION AGREEMENTS

Currently, the COCOO does not have a mutual recognition agreement with any other jurisdictions. However, it does recognize the credentials of internationally trained individuals from certain jurisdictions as equivalent. (See section 3.k above.)

6. APPLICANTS' INTERACTIONS WITH REGULATORY BODY

A. Nature and Frequency of Communication

Because the COCOO is one of the smallest regulatory bodies in Ontario, with only about 500 registrants, it operates with a certain degree of flexibility and is able to tailor some of its services to accommodate the needs of applicants. The college may follow up with applicants on the progress of their applications or allow some applicants to write examinations outside of the normal time frames if extenuating circumstances arise.

Communication between the regulatory body and applicants is frequent.

B. Backlogs

There is no backlog in the registration process.

C. Complaints Regarding the Registration Process

Complaints regarding the registration process are rare. Such complaints are handled by the Registrar and, if necessary, forwarded to the Registration Committee or the college's lawyer.

7. CHANGES SINCE THE 2005 SURVEY

The Ministry of Citizenship and Immigration conducted a survey in 2005 to collect information about occupational regulatory bodies in Ontario. There have been no substantial changes to the registration practices of the College of Chiropodists of Ontario since this survey.

8. REGISTRATION INFORMATION AND STATISTICS

Definitions used in these tables:

Alternative class of licence: a class of licence that enables its holder to practise with limitations; additional registration requirements must be met in order to be fully licensed. There are no alternative classes of licence granted by the COCOO.

Applicant: an individual who has applied to start the process for entry to the profession.

Applicant actively pursuing licensing: an applicant who had some contact with the COCOO within the year specified.

Inactive applicant: an applicant who had no contact with the COCOO within the year specified.

Member: an individual who is currently able to use the protected title or professional designation of “chiropodist” or “podiatrist.”

Languages in which application information materials are available

Language	2005	2006	2007
English	Yes	Yes	Yes
French	No	No	No
Other(s)	N/A	N/A	N/A

Countries where internationally educated applicants were initially trained in chiropody/podiatry

Applications Received	2005	2006	2007
Largest number	United States	United States	United States
Second-largest number	United Kingdom	United Kingdom	United Kingdom
Third-largest number			
Fourth-largest number			
Fifth-largest number			

Staff employed by the College of Chiropodists of Ontario

Number of Staff	2005	2006	2007
Involved in registration process	2	2	2
Involved in appeals process	1	1	1

Jurisdiction where members were initially trained in chiropody/podiatry (before they were granted use of the protected title or professional designation in Ontario)

Members	Ontario	Other Canadian Provinces	USA	Other International	TOTAL
Total members	389	0	87	26	502
Non-practising members	N/A	N/A	N/A	N/A	N/A

Applicants processed by the College of Chiropodists of Ontario in 2005

Jurisdiction where members were initially trained in chiropody/podiatry (before they were granted use of the protected title or professional designation in Ontario)						
In 2005 (Jan. 1 to Dec. 31)	Ontario	Other Canadian Provinces	USA	Other International	TOTAL	
New applications received	20	0	1	1	22	
Applicants actively pursuing licensing	3	0	2	1	6	
Inactive applicants	0	0	0	0	0	
Applicants who met all requirements and were authorized to become members but did not become members	0	0	0	0	0	
Applicants who became members	20	0	1	1	22	
Applicants who were authorized to receive an alternative class of licence but were not issued a licence	N/A	N/A	N/A	N/A	N/A	
Applicants who were issued an alternative class of licence	N/A	N/A	N/A	N/A	N/A	

Applicants processed by the College of Chiropodists of Ontario in 2006

Jurisdiction where members were initially trained in chiropody/podiatry (before they were granted use of the protected title or professional designation in Ontario)						
In 2006 (Jan. 1 to Dec. 31)	Ontario	Other Canadian Provinces	USA	Other International	TOTAL	
New applications received	16	0	2	1	19	
Applicants actively pursuing licensing	2	0	2	3	7	
Inactive applicants	3	0	0	2	5	
Applicants who met all requirements and were authorized to become members but did not become members	0	0	0	0	0	
Applicants who became members	16	0	2	1	19	
Applicants who were authorized to receive an alternative class of licence but were not issued a licence	N/A	N/A	N/A	N/A	N/A	N/A
Applicants who were issued an alternative class of licence	N/A	N/A	N/A	N/A	N/A	N/A

Applicants processed by College of Chiropodists of Ontario in 2007

Jurisdiction where members were initially trained in chiropody/podiatry (before they were granted use of the protected title or professional designation in Ontario)						
In 2007 (Jan. 1 to Dec. 31)	Ontario	Other Canadian Provinces	USA	Other International	TOTAL	
New applications received	18	0	2	1	21	
Applicants actively pursuing licensing	18	0	2	1	21	
Inactive applicants	0	0	0	0	0	
Applicants who met all requirements and were authorized to become members but did not become members	0	0	0	1	1	
Applicants who became members	18	0	1	1	20	
Applicants who were authorized to receive an alternative class of licence but were not issued a licence	N/A	N/A	N/A	N/A	N/A	N/A
Applicants who were issued an alternative class of licence	N/A	N/A	N/A	N/A	N/A	N/A

9. SOURCES

College of Chiropodists of Ontario website. <http://www.cocoo.on.ca/>. Last accessed:
December 17, 2007.

Representatives of the College of Chiropodists of Ontario met with staff of the Office of the Fairness
Commissioner on December 3, 2007, to provide further information for this study.

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