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Page 1: Fair Registration Practices Report 2022

Q1

Please indicate which regulator you are and your main point of contact should we require follow up.

College of Registered Psychotherapists of Ontario
Sarah Fraser, Director, Registration
s.fraser@crpo.ca

Q2

Section 1 - During the reporting period (January 1st–December 31st, 2022), please indicate if your organization has introduced any changes in the following areas impacting your registration processes by clicking on each of the appropriate boxes below. Registration requirements either through regulation, by-law or policy.

Yes,

Description of change/improvement that would impact fair registration outcomes:

1) Clinical supervision is one of the most pressing topics for CRPO, and an important part of the registration process. We have continued with the clinical supervision policy review. In 2022, this included staff research, feedback from CRPO's statutory committees, and targeted consultation with education programs and professional associations. Updates were provided to Council at the March 31, 2022 and September 21, 2022 meetings: <https://www.crho.ca/wp-content/uploads/2022/05/FINAL-Council-Minutes-March-31-2022.pdf> <https://www.crho.ca/wp-content/uploads/2022/09/Council-Meeting-3.pdf> Further updates will be provided in the 2023 Fair Registration Practices Report. 2) Council approved a revised Suitability to Practise Policy and rescinded the Good Character Policy. This was largely due to the fact that the Good Character Policy was redundant; most issues are covered by the Suitability to Practise Policy, and anything not already covered could be incorporated. The Suitability to Practise Policy was revised to incorporate the items in the Good Character Policy, to use gender neutral language, and to update terminology to focus on risk of harm to the public rather than unclear notions of the individual's personal character. <https://www.crho.ca/wp-content/uploads/2019/11/FINAL-Suitability-to-Practise-Policy-May-26-2022.pdf> 3) All applicants are required to complete the Jurisprudence e-Learning Module prior to applying. In 2022, CRPO began work to modernize the module and written manual. The Registration Committee provided feedback on draft content for the updated module. The new version will provide an improved user experience, contains up-to-date content, and takes less time to complete. The updated manual was published in 2022: <https://www.crho.ca/wp-content/uploads/2023/03/Professional-Practice-and-Jurisprudence-2.1.pdf> The updated module will be launched in 2023.

Q3

Assessment of qualifications

Yes,

Description of change/improvement that would impact fair registration outcomes:

Staff have implemented changes to application review procedures to align with the amendments of O. Reg. 508/22: REGISTRATION REQUIREMENTS, which went into effect on January 1, 2023. The changes applicable to CRPO include providing applicants with confirmation that their application is complete or details regarding what is outstanding within 15 days of submission; approving or referring to panel recognized, labour mobility and temporary applications within 30 days of determining the application is complete; reviewing the mapping tool for non-recognized program applications within a reasonable time period after determining the application is complete; and approving or referring to panel non-recognized program applications within 15 days of completing the mapping tool review. Key performance indicators related to these timelines will be tracked starting in 2023.

Q4

Timelines for registration, decisions and/or responses

Yes,

Description of change/improvement that would impact fair registration outcomes:

1) There was an increase in the number of applications received in 2022 compared to 2021 by approximately 43%. Two additional Registration staff were hired to account for the increase in applications received. Despite the increase in the number of applications received, the application processing timeline decreased in 2022. Registration staff continue to refine application review procedures to ensure applications are processed in a reasonable timeframe, including changes implemented in response to amendments of O. Reg. 508/22: REGISTRATION REQUIREMENTS (see question (3)). CRPO's website includes information about current processing timelines:

<https://www.crpo.ca/assessment-of-applications/> 2) In 2022, the Examination Committee granted a mass extension for any registrants impacted by the COVID-19 pandemic who are unable to make their first or final exam attempt within their specified timelines. These registrants were granted an extension to the spring 2023 exam administration to make their first or final attempt at the exam. This extension allows RP (Qualifying) registrants additional time to prepare to write the Registration Exam while allowing them to continue to practise. CRPO posted regular updates on our website to ensure registrants and stakeholders remained informed: <https://www.crpo.ca/2022-pandemic-related-exam-extensions/> By granting a mass extension to any registrants impacted by the COVID-19 pandemic, Registration staff and the Examination Committee were not required to review individual extension requests for reasons related to the pandemic.

Q5

Registration and assessment fees

Yes,

Description of change/improvement that would impact fair registration outcomes:

CRPO's by-laws set out that fee increases occur every two years for inflation. CRPO's fees were scheduled to increase in June 2022. Due to the economic strain resulting from the pandemic, Council approved a deferral of the planned June 2022 fee increase. Bi-annual increases will recommence beginning June 2024.

Q6

Resources for applicants

Yes,

Description of change/improvement that would impact fair registration outcomes:

1) As part of CRPO's policy review cycle, the following policies were updated to match the current policy template: Credential Assessment Policy; Program Definition Policy; PLAR Guidelines; and Qualifying Expiration Policy and Process. No substantive changes were made to these policies. Updated versions of these policies are available on the CRPO website: <https://www.crpo.ca/wp-content/uploads/2019/05/Credential-Assessment-Policy.pdf> <https://www.crpo.ca/wp-content/uploads/2019/03/Program-Definition-Policy.pdf> <https://www.crpo.ca/wp-content/uploads/2019/06/PLAR-Guidelines.pdf> <https://www.crpo.ca/wp-content/uploads/2022/05/Qualifying-Expiration-Policy-and-Process.pdf> 2) Section 6(4)(c)(ii) of CRPO's Registration Regulation states the third attempt of the Registration Exam is permitted only after the RP (Qualifying) registrant has completed upgrading, if any, required by a panel of the Examination Committee. The Examination Committee uses a decision tree and considers the registrant's reflections on their exam attempt when considering whether to require upgrading activities. In some cases, the Examination Committee directs or recommends the registrant to complete a Modified Peer and Practice Review, which is specifically modified from the one used by CRPO's Quality Assurance program, at a cost of \$425 to assist in identifying gaps in the entry-to-practice competencies. In 2022, the Examination Committee began a project to replace the Modified Peer and Practice Review with a Supervision Tool that a registrant can use at no cost with their clinical supervisor to reflect on an exam failure, identify gaps in competence, and develop a learning plan. The tool will be available to all CRPO registrants, not just those that have failed the exam twice, as an exam preparation resource. The pilot project for the Supervision Tool will be launched in 2023: <https://www.crpo.ca/supervision-tool/>

Q7

Changes to internal review or appeal process

Yes,

Description of change/improvement that would impact fair registration outcomes:

As noted in question (2), staff have implemented changes to application review and tracking procedures to align with the amendments of O. Reg. 508/22: REGISTRATION REQUIREMENTS, which went into effect on January 1, 2023.

Q8

Access by applicants to their records

No,

Description of change/improvement that would impact fair registration outcomes:

No changes.

Q9

Mutual recognition agreements

No,

Description of change/improvement that would impact fair registration outcomes:

No changes.

Q10

Training and resources for staff regarding registration

Yes,

Description of change/improvement that would impact fair registration outcomes:

1) Council and staff received training on unconscious bias. The workshop covered the different ways unconscious bias may arise, the impacts unconscious bias can have on organizations, and different ways of addressing unconscious bias. The workshop also included discussions in breakout rooms where participants worked through scenarios to identify and address unconscious bias in applicable situations. 2) Several registration staff participated in the Office of the Fairness Commissioner's webinar, "Incorporating Equity, Diversity and Inclusion Principles into Fair Registration Practices". Speakers from different regulatory bodies across Ontario, as well as a staff person from the Office of the Fairness Commissioner, discussed changes that they have implemented in their organizations, as well as in their application process, related to equity, diversity and inclusion. 3) One registration staff attended the Canadian Network of Agencies of Regulation (CNAR) 2022 Annual Conference. The in-person conference included sessions with topics related to: assessing good character; exam accommodations; unconscious bias and noise; and trauma informed practices. This training promotes fair registration outcomes by providing an opportunity for staff to hear best practices and teachable moments from other regulators and experts in the field of professional regulation. 4) CRPO continues to be an employer partner with the Canadian Centre for Diversity and Inclusion (CCDI). This partnership provides Council, committee members and staff with access to consultants and trainers with DEI expertise as well as to a resource library.

Q11

Relationship with third party service provider(s)

No,

Description of change/improvement that would impact fair registration outcomes:

No changes.

Q12

Accreditation of educational programs

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

1) Five education programs were granted academic recognition by the Registration Committee in 2022: the CREATE Institute – Diploma in Expressive Arts Therapy; the Tyndale University – Master of Arts in Clinical Counselling, the Athabasca University – Master of Counselling (Counselling Psychology), the Canadian International Institute of Art Therapy – Art Psychotherapy Diploma; and the Transformational Arts College Spiritual Psychotherapy Program. Applicants who complete these education programs do not need to provide detailed information about their education and training in their application for registration. These applicants complete a more streamlined application form, which generally takes less time for staff to process.

<https://www.crpo.ca/recognized-accepted-programs/> 2) In 2022, the Registration Committee granted clinical experience (CE) recognition to 11 recognized programs. Programs granted CE recognition on top of academic recognition have demonstrated that clinical experience hours obtained in the program meet CRPO's requirements and develop students' competence in psychotherapy. All hours successfully completed through a CE-recognized program will be accepted toward meeting CRPO registration requirements. Students from these programs no longer need to submit individual confirmation forms to report practicum, clinic, or student practice hours completed on or after April 1, 2018, as the hours are submitted to CRPO directly from the education institution. This process is more streamlined for applicants, registrants and staff, and generally takes less time for staff to process. <https://www.crpo.ca/clinical-experience-recognition/>

Q13

Technological or digital improvements

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

No changes.

Q14

Anti-racism and inclusion-based policies and practices

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

1) CRPO had put out a call in September 2021 for Registered Psychotherapists with Indigenous education and training, who work with traditional Indigenous practices and with Indigenous clients to assist, as non-Council committee members, in the review of future applications through the Indigenous Registration Pathway. Throughout the course of 2022, Council appointed four non-Council committee members to the Indigenous Registration Pathway Panel of the Registration Committee. 2) The Diversity, Equity and Inclusion Working Group (DEI WG) has been established and includes registrants from a broad range of equity-deserving groups. The DEI WG provides advice and recommendations to Council and committees on matters that relate to diversity, equity and inclusion affecting client members of the public, Registered Psychotherapists, and related practices, protocols and procedures.

Q15

Organizational structure

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

No changes.

Q16

Contingency or continuity of operations plans

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

As noted in question (4), additional Registration staff were hired in order to process the higher volume of applications received.

Q17

Documentation requirements for registration

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

No changes.

Q18

English / French language proficiency testing

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

No changes.

Q19

Section 2 – If applicable, please list your organization’s top three accomplishments during the reporting period that relate to fair registration practices.

- 1 **Commitment to DEI related work and training for staff and Council.**
 - 2 **Decrease in application processing timelines despite the increase in the number of applications received.**
 - 3 **Implementation of changes to align with amendments to O. Reg. 508/22: REGISTRATION REQUIREMENTS.**
-

Q20

Section 3 – If applicable, please list the top three risks that impacted your organization’s ability to achieve better registration outcomes for applicants during the reporting period. Please also indicate the measures you have taken to mitigate the impacts of these risks.

- 1

The last pandemic-related mass extension for exam writing timelines was made in 2022 and gave registrants until the spring 2023 exam administration to make their first or third exam attempt. There was a high volume of registrants who were required to make an exam attempt at the spring 2023 sitting. Registrants who do not write by their deadline risk expiry of their certificate of registration. To mitigate this risk, Registration staff started sending reminders about this deadline and information about how to submit individual extension requests due to extenuating circumstances at the end of 2022.
- 2

Registration staff continue to see some cases of plagiarism in the mapping tool of nonrecognized program applications. This poses a risk to fair registration practices as applicants may be misrepresenting the topics learned and developed as part of their education program and may be falsely claiming that competencies were covered by their education program. To mitigate this risk, Registration staff perform additional screening on mapping tools.
- 3

Some applicants have difficulty obtaining transcripts from their educational institution. This poses a risk to fair registration practices as applicants may be delayed in registering with CRPO. To mitigate this risk, Registration staff confirm whether there is alternative documentation that could be assessed, contact World Education Services to explore options for obtaining documentation or information regarding the credential, or ask the applicant if they would like their application to be put on hold if they are in the process of obtaining the transcript.

Q21

No

Section 4 – Do you believe that you have a Canadian Experience Requirement (CER)? If so, please describe the applicant competencies that you seek to develop through this requirement in the comment box below CER: work experience or experiential training obtained in Canada.

Q22

QUANTITATIVE SECTION The following quantitative 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. Languages Indicate the languages in which you make available application materials and information about the application process.

**English ,
French**

Q23

Membership Data Demographics Data As of December 31, 2022, please indicate the number of members in each gender category identified below and the number of total members.

Total Male	1949
Total Female	9388
Total Non-binary	49
Gender not provided	0
Overall Total	11386

Q24

In relation to your members: Do you collect race-based data?

No

Q25

Do you collect other identity-based or demographics data?

No

Q26

Do you plan to collect race-based data in the future?

Yes,
If yes, please indicate the type::
In 2023, the DEI WG began considering the self-identifying information to collect from applicants and registrants. The proposed questions cover six dimensions: gender identity, sexual orientation, Indigenous identity, racialised group identity, language and disability. This review is ongoing, and updates will be provided in the 2023 Fair Registration Practices Report.

Q27

Class of License/Certificate Data As of December 31, of the reporting year, please indicate the number of members under each class or license category as applicable.

Full/Independent Practice	7837
Provisional/Limited License/Certificate	3376
Emergency License/Certificate	0
All other classes	173
Overall Total	11386

Q28

Jurisdiction where members were initially trained As of December 31, of the reporting year, please indicate the membership type and total number of registered members for each category listed below.

Ontario	6609
Other Canadian Provinces and Territories	3191
USA	898
Other Countries	688
Multiple and/or Unspecified Jurisdiction	0
Total	11386

Q29

Please indicate the total number of registered members for the top 12 international countries or jurisdictions where these individuals obtained their initial education in the profession or trade.

1	United States of America: 898
2	India: 109
3	United Kingdom: 103
4	Iran: 82
5	Russia: 27
6	Switzerland: 27
7	Pakistan: 24
8	Australia: 22
9	Brazil: 19
10	Mexico: 17
11	China: 16
12	Hong Kong: 16

Q30

Applications Data Demographics Data Indicate the number of applicants who filed an application between January 1 and December 31 of the reporting year, in each applicable category.

Total Male	320
Total Female	1816
Total Non-binary	18
Gender not provided	0
Overall Total	2154

Q31**No**

In relation to the applications, you received: Do you collect race-based data?

Q32**No**

Do you collect other identity-based or demographics data?

Q33

Category of Applicants Number of applicants who voluntarily or involuntarily (through inactive and lapsed applications) withdrew from the application process between January 1 and December 31, 2022:

12

Q34

Please indicate the total number of applicants from Ontario who filed an application between January 1 and December 31, 2022 for the following categories as applicable.

Number of Applicants	779
Number of Applicants Licensed/Certified	744
Average Time to Process Application in Weeks from First Point of Applicant Contact	7
Average Time to Process Application in Weeks from Receipt of all Required Documents	2

Q35

Please indicate the total number of applicants from Canadian provinces and territories (excluding Ontario) who filed an application between January 1 and December 31, 2022 for each of the following categories as applicable.

Number of applicants	1131
Number of applicants fully licensed/certified	12
Average Time to Process Application in Weeks from First Point of Applicant Contact	5
Average Time to Process Application in Weeks from Receipt of all Required Documents	4

Q36

Please indicate the total number of certificate-to-certificate (labour mobility) applicants who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	9
Number of applicants fully licensed/certified	9
Average Time to Process Application in Weeks from First Point of Applicant Contact	3
Average Time to Process Application in Weeks from Receipt of all Required Documents	1

2022 Fair Registration Practices Report

Q37

Please indicate the total number of applicants from international jurisdictions (not including USA) who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	51
Number of applicants fully licensed/certified	4
Average Time to Process Application in Weeks from First Point of Applicant Contact	12
Average Time to Process Application in Weeks from Receipt of all Required Documents	3

Q38

Please indicate the total number of applicants from multiple and/or jurisdictions not specified who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	1
Number of applicants fully licensed/certified	1
Average Time to Process Application in Weeks from First Point of Applicant Contact	4
Average Time to Process Application in Weeks from Receipt of all Required Documents	0

Q39

Please indicate the total number of applicants from accredited Canadian post-secondary institutions who filed an application between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	1822
Number of applicants fully licensed/certified	37
Average Time to Process Application in Weeks from First Point of Applicant Contact	6
Average Time to Process Application in Weeks from Receipt of all Required Documents	2

2022 Fair Registration Practices Report

Q40

Please indicate the total number of applicants who re-registered after withdrawing from the application process between January 1 and December 31, 2022 for each of the categories as applicable.

Number of applicants	0
Number of applicants fully licensed/certified	0
Average Time to Process Application in Weeks from First Point of Applicant Contact	0
Average Time to Process Application in Weeks from Receipt of all Required Documents	0

Q41

Please provide any additional comments you may have for questions 33-41.

Questions 27; 35-40:

CRPO is interpreting the types of classes as follows:

Full/independent practice license - Registered Psychotherapist

Alternative class of license: provisional/limited license - Registered Psychotherapist (Qualifying) - These registrants must practise under supervision until they have met the clinical experience requirement and pass the Registration Examination.

Other classes - Registered Psychotherapist (Inactive) - These registrants are on long-term leave and not permitted to practise while in the category.

Questions 35-40, "First point of applicant contact":

CRPO is interpreting this to mean the date the applicant submits the application form for initial registration.

Questions 35-40, "Receipt of all required documents":

The ability to obtain this date for all applications has been added to the CRPO database but is only available for applications since December 2022. For calendar year 2022, CRPO has provided an average timeline based on a sample of ten applications per question (or based on all applications per question, if that number is under ten).

Question 39, "Applicants from accredited Canadian post-secondary institutions":

CRPO is interpreting this to refer to graduates of Canadian programs granted recognition by CRPO's Registration Committee.

Q42

Jurisdiction where applicants obtained their initial education Please indicate the total number of applicants for the top 12 international countries or jurisdiction where applicants obtained their initial education in the profession or trade.

1	United States of America: 55
2	India: 20
3	United Kingdom: 13
4	Iran: 11
5	Hong Kong: 9
6	Australia: 3
7	Spain: 3
8	Brazil: 2
9	Italy: 2
10	Jamaica: 2
11	Pakistan: 2
12	Afghanistan: 1

Q43

Processing Time As of December 31, 2022, how many full licenses/certificates did your organization issue?

949

Q44

Please indicate the total number of applicants who received full licensure/certification between January 1 and December 31, 2022, according to the following timelines.

0 – less than 3 months	949
3 months – less than 6 months	0
6 months – less than 12 months	0
12 months – less than 18 months	0
18 months – less than 24 months	0
24 months and greater	0

Q45

Age of Active Applications As of December 31, 2022 what were the total number of active applications in your case inventory?

154

2022 Fair Registration Practices Report

Q46	0 – less than 3 months	98
Please provide a breakdown (and total) of active applications according to the length of time (age) that they have been open.	3 months – less than 6 months	27
	6 months – less than 12 months	27
	12 months – less than 18 months	1
	18 months – less than 24 months	1
	24 months and greater	0
	TOTAL	154

Q47	Ontario	895
Other Licenses/Certificates of Registration ProcessedPlease indicate the number of applicants who were issued an alternative class of license* that your organization processed in the reporting year (January 1-December 31, 2022).Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.* An alternative class of license/certificate enables the holder to practice with limitations, but additional requirements must be met for the member to be fully licensed/certified.	Other Canadian Provinces and Territories	1250
	Certificate to Certificate (Labour Mobility)	0
	USA	65
	Other International	69
	Multiple and/or Unspecified Jurisdictions	0
	TOTAL	2279

Q48	Ontario	0
Other Licenses/Certificates of Registration ProcessedPlease indicate the number of applications, If applicable, who were issued an emergency license/certificate that your organization processed in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.	Other Canadian Provinces and Territories	0
	Certificate to Certificate (Labour Mobility)	0
	USA	0
	Other International	0
	Multiple and/or Unspecified Jurisdictions	0
	TOTAL	0

Q49	Ontario	558
Other Licenses/Certificates of Registration ProcessedPlease indicate the number of Provisional license/certificate or alternative class of license/certificate holders who were fully licensed/certified by your organization which were processed in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.	Other Canadian Provinces and Territories	291
	Certificate to Certificate (Labour Mobility)	2
	USA	35
	Other International	53
	Multiple and/or Unspecified Jurisdictions	0
	TOTAL	939

2022 Fair Registration Practices Report

Q50		66
Number of Reviews and Appeals Processed State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2022). For applicants who were subject to an internal review or who were referred to a statutory committee of your governing council, such as a Registration Committee. Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.	Ontario	66
	Other Canadian Provinces	16
	USA	11
	OtherCountries	43
	Multiple and/or Unspecified Countries	3
	TOTAL	139

Q51		0
State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2022). For applicants who initiated an appeal of a registration decision. Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.	Ontario	0
	Other Canadian Provinces	0
	USA	0
	OtherCountries	0
	Multiple and/or Unspecified Countries	0
	TOTAL	0

Q52		0
State the number of reviews and appeals heard in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.	Ontario	0
	Other Canadian Provinces	0
	USA	0
	OtherCountries	2
	Multiple and/or Unspecified Countries	0
	TOTAL	2

Q53		0
State the number of registration decisions changed following an appeal and/or review that your organization processed in the reporting year (January 1-December 31, 2022). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.	Ontario	0
	Other Canadian Provinces	0
	USA	0
	OtherCountries	0
	Multiple and/or Unspecified Countries	0
	TOTAL	0

Q54	
List the top three reason for appeals (by percentage) of a registration decision	
1	Education
2	Currency
3	Conduct

Q55

List the top five reasons (by percentage) for not Issuing a License/Certification to Internationally Trained Individuals

1	Education
2	Currency
3	Conduct
4	N/A
5	N/A

Q56

List the top Five Reasons (by percentage) for not Issuing a License/Certification to Canadian Graduates

1	Education
2	Currency
3	Conduct
4	N/A
5	N/A

Q57

Please provide any additional comments you may have:

Question 42: The other countries with one applicant are Algeria, Belgium, Ethiopia, France, Lebanon, Mexico, Peru, Russia, South Africa, Taiwan, Trinidad and Tobago, Turkey, and Uganda.

Question 43: CRPO is interpreting this to refer to Qualifying registrants who transferred to the full RP category in 2022 and to applicants through labour mobility who were issued certificates of registration in the full RP category.

Question 44: CRPO is interpreting this to refer to Qualifying registrants who transferred to the full RP category in 2022 and to applicants through labour mobility who were issued certificates of registration in the full RP category.

Questions 45 and 46: CRPO is interpreting “active applications” to refer to applications where decisions have not yet been issued. Conditionally approved applications are not included, as decisions have already been issued. Applications placed on hold at the applicant’s request are included.

Question 51: CRPO does not have an internal appeal process. Registration Committee decisions can be appealed to the Health Professions Appeal and Review Board (HPARB), addressed in question 52.

Question 52: CRPO is interpreting this to refer to appeals heard by HPARB.
