

### CTCMPAO Comparison Chart

Existing Clause (if applicable)	Proposed New Clause	Rationale
<p>2. The following are prescribed as classes of certificates of registration:</p> <ol style="list-style-type: none"> <li>1. General.</li> <li>2. REVOKED: O. Reg. 27/13, s. 24 (1).</li> <li>3. Student.</li> <li>4. Temporary.</li> <li>5. Inactive.</li> <li>6. Emergency. O. Reg. 27/13, ss. 2, 24 (1); O. Reg. 300/23, s. 1.</li> </ol>	<p>2. The following are prescribed as classes of certificates of registration:</p> <ol style="list-style-type: none"> <li>1. General.</li> <li>2. REVOKED: O. Reg. 27/13, s. 24 (1).</li> <li>3. Student.</li> <li>4. Temporary.</li> <li>5. Inactive.</li> <li>6. Emergency. O. Reg. 27/13, ss. 2, 24 (1); O. Reg. 300/23, s. 1.</li> <li>7. <u>Doctor</u></li> </ol>	<p>Section 2 sets out the available classes of registration for the profession. The list will need to identify the Doctor class so that applicants and the public are aware of the availability of this class.</p>
<p>5. (1) Every certificate of registration is subject to the following terms, conditions and limitations:</p> <p>7. Subject to subsection (2), a member who holds a certificate of registration listed in Column 1 of the Table to this subsection,</p> <ol style="list-style-type: none"> <li>i. shall only use the titles listed in Column 2 opposite the certificate of registration, and</li> <li>ii. shall only use the designations listed in Column 3 opposite the certificate of registration, if applicable.</li> </ol>	<p>[table to include following]</p> <p>3.2 Student Doctor of Traditional Chinese Medicine</p> <p>5.2. Doctor of Traditional Chinese Medicine (Inactive)</p> <p>5.3. DTCM (Inactive)</p> <p>7.2. Doctor of Traditional Chinese Medicine (Temp)</p> <p>7.3. DTCM (Temp)</p> <p>11.1.1 Doctor</p> <p>11.1.2 Doctor of Traditional Chinese Medicine</p> <p>11.1.3 DTCM</p>	<p>Paragraph 7 of subsection 5(1) refers to the Table which identifies the class and its corresponding title and designation. This table will need to be amended to identify the proper titles and designations that can be used for the Doctor class. This must be clear for members and the public, so that improper titles and designations are not used.</p>
<p>12.(1) the following are registration requirements for a Student certificate of registration:</p> <ol style="list-style-type: none"> <li>1. The applicant must: <ol style="list-style-type: none"> <li>i. be enrolled in a post-secondary program in traditional Chinese medicine referred to in paragraph 1 of subsection 9 (1)</li> </ol> </li> </ol>	<p>12.(1) the following are registration requirements for a Student certificate of registration:</p> <ol style="list-style-type: none"> <li>1. The applicant must: <ol style="list-style-type: none"> <li>i. be enrolled in a post-secondary program in traditional Chinese medicine referred to in paragraph</li> </ol> </li> </ol>	<p>Change is necessary to allow students enrolled in a doctor of TCM education program to be eligible for the Student Class.</p>

	1 of subsection 9 (1) or <b>paragraph b of subsection 20.4.(1)2.,</b>	
12.(1) the following are registration requirements for a Student certificate of registration: 1. The applicant must: ii. be enrolled in a program referred to in paragraph 2 of subsection 9 (1), or	12.(1) the following are registration requirements for a Student certificate of registration: 1. The applicant must: ii. be enrolled in a program referred to in paragraph 2 of subsection 9 (1) <b>or paragraph c of subsection 20.4.(1)2, or</b>	Change is necessary to allow students enrolled in a doctor of TCM education program to be eligible for the Student Class.
12.(1) the following are registration requirements for a Student certificate of registration: 1. The applicant must: iii. have applied to take the registration examinations referred to in paragraph 6 of subsection 9 (1), but have not yet taken the examinations.	12.(1) the following are registration requirements for a Student certificate of registration: 1. The applicant must: iii. have applied to take the registration examinations referred to in paragraph 6 of subsection 9 (1), <b>or paragraph f of subsection 20.4.(1)2</b> but have not yet taken the examinations.	Change is necessary to allow students enrolled in a doctor of TCM education program to be eligible for the Student Class.
13. The following are terms, conditions and limitations on every Student certificate of registration: 1. The member shall only practise the profession while under the supervision of a member who holds a General certificate of registration who can communicate with the member in the member's language and who has been approved by the Registrar.	13. The following are terms, conditions and limitations on every Student certificate of registration: 1. The member shall only practise the profession while under the supervision of a member who holds a General certificate of registration <b>or Doctor of Traditional Chinese Medicine certificate of registration</b> who can communicate with the member in the member's language and who has been approved by the Registrar.	Change will allow Doctor Class members to supervise Student Class members.
15. (1) The following are registration requirements for an Inactive certificate of registration: 1. The applicant must be a member holding a General certificate of registration or	15. (1) The following are registration requirements for an Inactive certificate of registration: 1. The applicant must be a member holding a General certificate of registration <b>or Doctor of Traditional Chinese Medicine certificate of registration.</b>	Change necessary to allow Doctor Class members to transfer to the Inactive Class.
18. (1) The following are registration requirements for a Temporary certificate of registration: 1. The applicant must be registered or licensed to practise traditional Chinese medicine in another jurisdiction in	18. (1) The following are registration requirements for a Temporary certificate of registration: 1. The applicant must be registered or licensed to practise traditional Chinese medicine in another jurisdiction in	Change necessary to allow for temporary Doctor Class registration.

which the requirements for registration or licensure are similar to those in paragraphs 1 and 2 of subsection 9 (1).	which the requirements for registration or licensure are similar to those in paragraphs 1 and 2 of subsection 9 (1) <b>or paragraphs b and c of subsection 20.4.(1)2.</b>	
18. (1) The following are registration requirements for a Temporary certificate of registration: 3. A holder of a General certificate of registration who is approved by the Registrar must have agreed to supervise the applicant and to be responsible for ensuring that the applicant provides appropriate and continuing care to patients.	18. (1) The following are registration requirements for a Temporary certificate of registration: 3. A holder of a General certificate of registration <b>or Doctor of Traditional Chinese Medicine certificate of registration</b> who is approved by the Registrar must have agreed to supervise the applicant and to be responsible for ensuring that the applicant provides appropriate and continuing care to patients.	Change will allow Doctor Class members to supervise Temporary Class members.
20.2 The following are additional terms, conditions and limitations on every Emergency certificate of registration: 1. The member may only practise the profession under the supervision of a holder of a General certificate of registration who has been approved by the Registrar.	20.2 The following are additional terms, conditions and limitations on every Emergency certificate of registration: 1. The member may only practise the profession under the supervision of a holder of a General certificate of registration <b>or Doctor of Traditional Chinese Medicine certificate of registration</b> who has been approved by the Registrar.	Change will allow Doctor Class members to supervise Emergency Class members.
-	<u>Registration Requirements, Doctor class</u>  20.4 (1) The following are non-exemptible registration requirements for a Doctor of Traditional Chinese Medicine certificate of registration:	This will be a new section, identifying the minimum requirements that applicants must meet to be issued a certificate of registration in the Doctor Class. This section sets out the core, non-exemptible requirements for registration. Non-exemptible requirements must be met for an application to be accepted by the College. Otherwise, exemptible requirements may be exempted by the Registration Committee if the intent of the requirement can be met in another way.  This class will have two pathways for registration, one for current members and one for new members.

		<p>The need for a pathway for current members was identified as current members have already been assessed for the entry-level competencies. However, the Doctor Class competencies are at a higher level and require a demonstration of competency by members. Depending on their level of experience, current members are exempt from some of the requirements that new members would be required to demonstrate.</p>
-	<p>1. The applicant is currently a member in good standing who holds a General certificate of registration with a R.TCMP designation and;</p>	<p>This is the pathway for applicants who are registered members of CTCMPAO. For the purposes of this section, the College will develop a policy outlined what is considered “in good standing”.</p> <p>As noted above, because these are registered Members who practice TCM in Ontario, it is proposed that they not be required to undergo duplicate evaluation they already completed to become a TCM Practitioner. Rather, they are asked to provide information on their education outside of TCM, their current practice experience, and complete an examination based on the Doctor Title competencies only. Members with 10 or more years experience are further exempt from providing further education.</p>
-	<p>a. provides evidence of the following:</p> <ul style="list-style-type: none"> <li>i. Successful completion of two years of study at the bachelor level at an Ontario university or study that is substantially equivalent as determined by the Registration Committee; and</li> <li>ii. Successful completion of the registration examinations that are set or approved by the Council; and</li> <li>iii. Within five years of applying, has practised the profession as a member of the College,</li> </ul>	<p>Due to the expectations on Doctor Title holders, the College expects a higher level of education for those seeking to enter the Doctor Class. This includes demonstrating university level education. The College proposes that the Registration Committee is able to determine if other education is equivalent to a bachelor level education. Examples of equivalent education could be education at a university outside of Ontario, or diploma level education in certain circumstances.</p>

	<p>in both traditional Chinese acupuncture and traditional Chinese herbal medicine in a manner acceptable to the College, for three years with a minimum of 2,400 patient visits; or</p>	<p>The examination for this route will comprise of questions limited only to the Doctor Class competencies. As current members have been previously tested on entry-level competencies, it is appropriate to exempt these members from completing the full Doctor Class examinations that new graduates will be required to complete.</p> <p>As these members are exempt from some requirements that new graduates will be required to complete, it is expected that they demonstrate a high level of experience. This experience is necessary for the member to acquire the competencies that would not necessarily have been part of their education. The College is proposing that these members show 2400 patient visits over a three-year period that does not extend beyond the five years before the date of their application. Further, they must demonstrate that these patient visits cover a range of treatments and disorders. Members will be asked to provide evidence of these treatments through records (e.g., patient records, billing records).</p> <p>The purpose of the five year window is to account for breaks or pauses in practice, such as maternity leave.</p>
-	<p>b. provides evidence of the following which are non-exemptible:</p> <ul style="list-style-type: none"> <li>i. Successful completion of the registration examinations that are set or approved by the Council; and</li> <li>ii. Within twelve years of applying, has practised the profession as a member of the College, in both traditional Chinese acupuncture and traditional Chinese</li> </ul>	<p>Similar to the above pathway, however members with a minimum of 10 years of practice and a minimum of 8,000 patient visits, are exempted from demonstrating bachelor level education. The College considers this additional experience to be equivalent.</p> <p>These members will also be limited to being tested on Doctor Class competencies; however, the examination will be formatted more towards a</p>

	herbal medicine in a manner acceptable to the College, for ten years with a minimum of 8,000 patient visits; or	clinical setting rather than multiple choice questions.
-	2. The applicant provides evidence of the following:	This is the second pathway for non-members who are not registered in another Canadian jurisdiction.
-	a. Successful completion of two years of study at the bachelor level at an Ontario university or study that is substantially equivalent as determined by the Registration Committee;	As noted above, the College expects a high level of education for those entering the Doctor Class. This will function as above, with the Registration Committee having the express ability to determine equivalent education.
-	b. Successful completion of a post-secondary doctor of traditional Chinese medicine program that consists of at least five years of education, each year of which consists of at least 560 hours of classroom theoretical instruction or at least 728 hours of practical instruction or some combination of the two where, for every hour of classroom theoretical instruction that is less than 560 hours there must be a corresponding increase of 1.3 hours in the number of hours of practical instruction or education that is of equivalent duration,	<p>The definition for full-time education for the General Class is outlined in this regulation as consisting of 480 hours of theoretical instruction per year. The Doctor Title Working Group did not believe this was sufficient for the Doctor Class, and so a new definition of 560 hours of theoretical instruction per year was proposed. 560 hours over 5 years is more in line with the requirements for other “Doctor Title” offering professions and is in line with public expectations on those who are issued the “doctor title”.</p> <p>Applicants who have completed education to be eligible for the General Class may take additional education to meet the Doctor Class requirements.</p> <p>It has been discussed at length that a degree program would be preferred for the entry requirement for this class. However, no such program currently exists. In addition, the College considers the program set out in this section to be equivalent to a degree program. It is therefore unnecessary to specify that in regulation. At a time</p>

		when a degree program does exist, this section can be amended as necessary.
-	c. Successful completion a program of clinical experience in the profession that is structured, comprehensive, supervised and evaluated and which consists of at least 45 weeks of clinical experience involving at least 1200 hours of direct patient contact.	<p>In addition to the 5 years of theoretical/practical instruction required above, applicants must also complete 1200 hours of clinical experience that involves direct patient contact. This experience must be at a minimum of 45 weeks.</p> <p>This experience is necessary to give students the necessary clinical skills to be successful in independent practice.</p> <p>The College is proposing requiring a number of hours that is more than double what is expected of General Class applicants. Applicants to the Doctor Class are expected to be competent in a broader and more complex range of treatments than those in the General Class. The additional hours are necessary to build these competencies in a clinical setting.</p>
-	d. Successful completion of the Safety Program that was set or approved by the Council or by a body that is approved by the Council for that purpose.	This requirement mirrors the requirement for the General Class. The Safety Program is a program which ensures applicants are mindful and aware of the expectations regarding safe practice of TCM and are familiar with the College's safety program handbook. This also ensures competency and currency.
-	e. Successful completion of the jurisprudence course set or approved by the Registration Committee.	This requirement mirrors the requirement for the General Class. The jurisprudence course is an assessment which ensures applicants are mindful and aware of Ontario's regulatory landscape and are familiar with the College's Jurisprudence Handbook. This assists members, and most importantly patients, to be provided safe, ethical and competent care. This ensures competency and currency.

-	f. Successful completion of the registration examinations that are set or approved by the Council.	Applicants of the Doctor Class will be required to complete a registration examination. This examination will test candidates for the entry-level competencies and Doctor Class competencies.
-	g. The applicant must have successfully passed an assessment conducted by a panel of the Registration Committee, or by another body that is approved by the Council for that purpose, that demonstrates that the applicant has the necessary competency to safely practise the profession as the holder of a Doctor certificate of registration.	<p>This assessment is also required for General Class members. Paragraphs b. and c. above ensure that the applicant has the appropriate length of education; however, this requirement ensures that the content of the education matches the Doctor Title competencies. This is done by a review of the course syllabi by College staff.</p> <p>Until degree offering programs or approved programs are in place, this requirement is necessary to ensure applicants have the necessary competencies to be eligible for practice.</p>
-	<p>20.4(2) If the applicant has not satisfied the requirements set out in paragraph b of subsection (1) para 2 either within one year immediately before the date that the applicant submitted his or her application or at some point following the submission of his or her application, the applicant must,</p> <p>(a) have practised the profession during the three-year period of time that immediately preceded the date that the applicant submitted his or her application, which practice included conducting a minimum of 500 traditional Chinese medicine patient visits, which may include traditional Chinese acupuncture patient visits; or</p> <p>(b) have, within the 12-month period that immediately preceded the date that the applicant submitted his or her application, successfully completed a refresher</p>	<p>This requirement ensures the applicant's competencies are current. An applicant applying for registration more than a year after completing their education poses a risk to the public as there could be a loss of knowledge, skills, or judgment due to the passage of time away from education/practice. This requirement ensures applicants who may have gaps in their knowledge have those gaps remedied prior to beginning independent practise.</p>



	program approved by the Registration Committee.	
-	(3) The requirement in paragraph c of subsection (1) para 2 is not considered to have been met if the program referred to in that paragraph commenced prior to the commencement of the program in doctor of traditional Chinese medicine referred to in paragraph b of subsection (1) para 2.	This condition requires that the program of clinical experience begins after they have started their doctor of traditional Chinese medicine education program.
	(4) The requirements in paragraphs d and e of subsection (1) para 2 are not considered to have been met unless the applicant satisfies those requirements either within the three-year period immediately before the date of that applicant's application or at some point following the submission of his or her application.	This condition outlines the timeframe for the completion of the Safety Program and the jurisprudence course.
-	(5) Subject to subsections (6) and (7), the requirements in paragraph f of subsection (1) para 2 are not considered to have been met unless the applicant successfully completed the examinations,  (a) after the date on which he or she met the requirements in paragraph g of subsection (1) para 2; or (b) within three attempts.	This outlines the conditions for the completion of the registration examinations set or approved by Council. It also sets the exam attempts for new applicants at 3.
-	(6) In the case of an applicant who does not successfully complete the examinations within three attempts, the requirements in paragraph f of subsection (1) para 2 will be considered to have been met if the applicant successfully completed the examinations on the applicant's fourth attempt after having first successfully completed the further education or training or combination of education and training, if any, required by a panel of the Registration Committee.	Applicants may be provided with a fourth attempt of the registration examination on the condition that they complete further training or education.
-	(7) Where, by virtue of clause (b) of subsection (5) and subsection (6), an applicant is not considered	If an applicant is unable to complete the examination in 4 attempts, they must retake the

	to have met the requirements in paragraph f of subsection (1) para 2, the successful completion of the examinations on any further attempt will not be considered as satisfying the requirements in paragraph f of subsection (1) para 2 unless, prior to sitting the examinations, the applicant completes another program mentioned in paragraph b of subsection (1) para 2.	full doctor of TCM education program prior to taking the exam again.
-	(8) Where, by virtue of clause (a) of subsection (5), an applicant is not considered to have met the requirements in paragraph f of subsection (1) para 2, the attempt or attempts to sit the examinations that led to the meeting of those requirements will not be considered for the purposes of clause (5) (b) and subsection (6).	Applicants must successfully pass an assessment, as outlined in paragraph g subsection (5), for their successful examination attempt to be considered as meeting the requirements for the Doctor class.
-	<u>Additional terms, etc., Doctor Class</u>  20.5(1) The following are additional terms, conditions and limitations on every Doctor certificate of registration:	This is a new section.  The Doctor Class will have specified Terms, Conditions, and Limitations (TCLs) to reflect the stringent entry to practise requirements.
-	1. The member must either,  i. conduct a minimum of 500 traditional Chinese medicine patient visits, which may include traditional Chinese acupuncture patient visits, during every three-year period where the first three-year period begins on the day that the member is issued a Doctor certificate of registration and each subsequent three-year period begins on the first anniversary of the commencement of the previous period, or	Currently, the O. Reg 27/13 requires General Class members to complete 500 patient visits over each three-year period they are a member. This is the minimum level of practice that must be done to maintain the knowledge, skills and judgment necessary to practise the profession. Members who are unable to meet the 500 patient visits of three years will not be considered to be current.
-	ii. within the 12 months prior to the expiry of each period referred to in subparagraph i in which the member does not meet the requirements of that subparagraph,	As a safeguard, if a member is unable to meet the threshold for patient visits over the three-year period, they will be directed to remedial activities (i.e., completion of a refresher course).

	successfully complete a refresher program approved by the Registration Committee.	
-	(2) If a member fails to meet the term, condition and limitation described in paragraph 1 of subsection (1), the Registrar shall refer the member to the Quality Assurance Committee for a peer and practice review.	If a member is unable to meet the threshold as identified in paragraph 1, or complete the remedial opportunities in paragraph 2, the member will be referred to the QA Committee for a peer and practice assessment.
	<p><u>Labour mobility, Doctor of Traditional Chinese Medicine Class</u></p> <p>20.6. (1) Where section 22.18 of the Health Professions Procedural Code applies to an applicant for a Doctor of Traditional Chinese Medicine certificate of registration, the applicant is deemed to have met the requirements set out in paragraphs a, b, c, d, f, and g of subsection 20.4.(1)2. and in subsection 20.4.(2) of this Regulation. O. Reg. 27/13, s. 23 (7).</p>	This section allows for a transfer of registration from another Canadian jurisdiction to Ontario, provided that there is an equivalent title to “Doctor of Traditional Chinese Medicine”. In compliance with the <i>Health Professions Procedural Code</i> , applicants will be exempt from all requirements in section 20.4.(1)2., except for the jurisprudence course. This course focuses specifically on Ontario jurisprudence, and it is expected that all applicants have this knowledge to practise safely in Ontario.
	(2) It is a non-exemptible registration requirement that an applicant referred to in subsection (1) provide one or more certificates or letters or other evidence satisfactory to the Registrar or a panel of the Registration Committee confirming that the applicant is in good standing as a doctor of traditional Chinese medicine in every jurisdiction where the applicant holds an out-of-province certificate. O. Reg. 27/13, s. 11 (2).	Instead of the requirements set out in 20.4.(1)2., the College will instead request a “Letter of Standing” from the regulator in the jurisdiction where the applicant is currently registered. This letter will confirm if the applicant is in good standing, or if there are any concerns with their registration in that jurisdiction.
	(3) If an applicant to whom subsection (1) applies is unable to satisfy the Registrar or a panel of the Registration Committee that the applicant practised the profession of traditional Chinese medicine to the extent that would be permitted by a Doctor of Traditional Chinese Medicine certificate of registration at any time in the three years immediately before the date of that applicant’s application, it is a non-exemptible requirement that the applicant must meet any	This requires that the applicant has some practise experience in the other Canadian jurisdiction prior to being eligible for registration in Ontario. The intent is to limit individuals from using labour mobility to avoid other registration requirements in Ontario that may not apply in other jurisdictions. This requires that the applicant have an established practice outside of Ontario.

	further requirement to undertake, obtain or undergo material additional training, experience, examinations or assessments that may be specified by a panel of the Registration Committee. O. Reg. 27/13, s. 11 (3).	
	(4) An applicant referred to in subsection (1) is deemed to have met the requirement of paragraph 4 of subsection 4 (1) if the requirements for the issuance of the out-of-province certificate included language proficiency requirements equivalent to those required by that paragraph. O. Reg. 27/13, s. 11 (4).	This considers applicants to have met our language fluency requirement if the applicant is registered in a Canadian jurisdiction that has a similar language fluency requirement.
	(5) Despite subsection (1), an applicant is not deemed to have met a requirement if that requirement is described in subsection 22.18 (3) of the Health Professions Procedural Code. O. Reg. 27/13, s. 11 (5).	This section added ensures compliance with the <i>Health Professions Procedural Code</i> .