



Ontario's Teaching Regulator
L'organisme de réglementation
de l'enseignement en Ontario

June 2, 2022

Nancy Naylor
Deputy Minister
Ministry of Education
438 University Ave., 5th Floor
Toronto, Ontario, M7A 2A5

Dear Deputy Minister Naylor,

Thank you for your letter dated May 25, 2022 where you raised concerns related to the College's application processes for Certificates of Qualification and Registration. To ensure that all your requests are addressed promptly, please direct any future correspondence to both the Interim Registrar and the Chair of Council.

We acknowledge that there are current challenges related to the ongoing teacher shortages faced by the province and a collective solution from all stakeholders is required. The College is committed to being part of the solution.

As part of this commitment, we want to highlight the progress that we have made to address the teacher shortage. For example, we have:

- **Restructured our approach to evaluating applications:**
 - Prioritizing Temporary Certificate licensure requests;
 - Prioritizing applications in specific subjects where there has been an identified need (e.g., French and technological education); and
 - Creating a process to expedite files for applicants with confirmed school board offers of employment. We have heard from school boards that this process has been very effective and have continuously encouraged them to use this expedited list while we still have the capacity to honour it.
- **Leveraged the use of technology:**
 - Automating the issuance of Temporary Certificates. Ontario applicants can expect to be certified within 1-15 business days after submitting all required documents and fees;
 - Accepting an increasing number of electronic documents (academic transcripts and language proficiency scores); and
 - Exploring more user-upload of documents such as name changes, proof of identity, proof of employment (for applicants of technological education).
- **Expanded and redeployed staff resources:**
 - Adding more dedicated staff to processing applications and answering client queries; and
 - Reallocating existing staff to provide assistance.

As a result of these changes, we can confirm that there are no delays at this time in processing applications for graduates of Ontario faculties of education. General Certificates of Qualification and Registration and Temporary Certificates of Qualification and Registration are issued within days of Ontario graduates completing an application that includes all of the required documents and fees. To the extent that processing delays exist, they are a result of the College not receiving all required documents or receiving documents that do not meet the requirements.

Data reporting

The data set related to applications received and certificates issued is available at p.16 in the latest [Registrar's Report to Council \(March 2022\)](#). The next set of data will be available in the Registrar's June 2022 report to Council. The Ministry can expect to receive this data from the College on a quarterly basis. This data set provides the only reliable information about members eligible for employment. Other initial or interim data about open applications are incomplete and/or subject to potential misinterpretation. It is important to note that applications for certification are seasonal and many teacher candidates open an application with the College up to two years before they graduate. Historically, the College issues the majority of certificates in June/July which aligns with the conferral of the professional degree for teacher candidates in Ontario.

Fair Access to Regulated Professions and Compulsory Trades Act

With respect to the recent changes to the *Fair Access to Regulated Professions and Compulsory Trades Act (FARPACTA)*, the College is supportive of reducing registration timelines for applicants. We recognize that the recently announced changes to *FARPACTA* are intended to have a positive impact on applicants. In the same vein, the College has continuously sought to find ways to streamline its registration process. However, we are concerned that the recent *FARPACTA* changes do not take into consideration the unique nature of each profession's application process and the fact that application timelines are often affected by the timeliness of both the applicant's and third-party responses. These timelines are outside the College's control, and as a result, the *FARPACTA* changes may have unintended and negative consequences for applicants.

Enhancing the Ministry and College working relationship

We continue to appreciate the opportunity to collaborate with the Ministry, which has proven to be an effective working relationship. We recognize that the last two years have been challenging for both the Ministry and the College due to the pandemic and the numerous regulatory changes to the certification process.

While we understand that there are many factors outside the Ministry's control, it would be helpful to have adequate time to assess the impact of new regulatory initiatives so that the College can adapt its internal operations and effectively communicate the changes to stakeholders. In addition, we would appreciate a more active role in regulatory and legislative development, so our operational needs are better reflected in the legislative language. For example, the Mathematics Proficiency Test, the Sexual Abuse Prevention Program, and the Temporary Certificates initiatives underwent multiple iterations without

adequate time for the College to consider the impact of each of these changes internally and externally. The short turnaround times for these changes created unnecessary implementation challenges for the College, often doubling the amount of time staff would normally dedicate to a specific application. Allowing the College to be actively involved at the outset of the development of regulatory initiatives would help prevent future operational challenges, which in turn would help reduce certification delays.

The solution to the teacher shortage requires collective efforts from all stakeholders. For example, the College can work with the Ministry and others to develop a bridging program for internationally-educated teachers, a group that the Transition to Teaching report has identified as being underemployed.

In addition, the College has also encouraged school boards to hire from within a pool of over 70,000 members who have maintained their membership in Good Standing, but who are not currently employed by a public school board. The College has worked with the Ministry to hold presentations that clarify to school boards that all holders of Certificates of Qualification and Registration, including Temporary Certificates of Qualification and Registration, are eligible to be hired as long as they remain in Good Standing.

Finally, prior to the changes in the Teachers' Qualifications Regulation in 2015, the College licensed approximately 9,000-10,000 applicants annually, the vast majority of whom came from Ontario faculties of education. Since 2015, the College licenses approximately 5,000-6,000 new members annually. Internationally-educated teacher applicant numbers have declined somewhat, and the labour mobility applicant numbers from other Canadian provinces remain constant. The College can only certify as many teachers as are graduating each year. One way to meet the downstream need for teachers, which is outside the College's jurisdiction, would be to increase the number of seats available for teacher candidates at Ontario faculties of education.

The College can support the Ministry with respect to any future initiatives and engagement with stakeholders to maximize placements of certified teachers in the classrooms.

We appreciate the issues you have raised and look forward to working with the Ministry towards our collective goal of addressing the teacher shortage.

Sincerely,



Diana Miles
Chair of Council



Chantal Bélisle, OCT
Interim Registrar and Chief Executive
Officer