

Bill 27, Working for Workers Act, Written Brief
Internationally Trained Dentists Association of Canada
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Summary

- Internationally Trained Dentists face barriers that prevent them from working as Dentists in Canada
 - Equivalency process
 - Long wait times and a lack of spots for examinations
 - Examinations that have not been benchmarked against Canadian graduates
- These lead to unnecessary suffering for internationally trained dentists
 - Mental health issues
 - Debt
 - Many are working minimum wage jobs to survive
- A majority of newly licensed dentists in Ontario are internationally trained
- The Canadian Occupational Projection systems predicts a shortage of 5000 dentists in Canada by 2028
- Given the nature of self-regulated organizations in Canada, there is no body to exert oversight over the National Dental Examining Board of Canada
- Proposed solutions
 - The Royal College of Dental Surgeons of Ontario can provide an alternative licensing pathway for internationally trained dentists
 - Mandate that the National Dental Examining Board of Canada have one standard of competency for dentistry in Canada
 - Eliminate the equivalency process and allow us to take the certification exams
 - Create an independent appeal body through the Office of the Fairness commissioner to allow judgements and actions to be taken against organizations who are not abiding by the principles of transparency, objectivity, impartiality, and fairness.
 - Give the Office of the Fairness Commissioner the power to impose consequences on organization that are not complying with their principles.

The Internationally Trained Dentists Association of Canada represents internationally trained dentists across Canada. Our membership consists of internationally trained dentists across Canada. Our main objective is to advocate for the improvement of the equivalency process so internationally trained dentists have fairer access to the dental profession in Canada.

Dental Regulation in Canada works in a 4-step process: Education, Accreditation, Certification, and Licensure. Education comes from the dental schools in Canada. Accreditation is the Commission of Dental Accreditation of Canada (CDAC). The CDAC evaluates schools and gives them an accredited status. Certification comes from the National Dental Examining Board of Canada (NDEB). They ensure the competency of recent graduates. If the graduate is from an accredited program, the graduate must complete two certification exams. If the graduate is from a non-accredited program, the graduate must complete 3 equivalency exams then the 2 certification exams. Licensure is through the provincial regulatory authorities. In Ontario, it is the Royal College of Dental Surgeons of Ontario (RCDSO). Once a dentist is accepted by the college, that dentist can work in Ontario. The provincial regulatory authorities have the most influence over this process. For internationally trained dentists the barriers we face come at the certification step.

The equivalency process began in 2011. The initiative came from Employment and Social Development Canada and the Forum of Labour Market Ministers. The Foreign Credentials Recognition Program gave the NDEB \$800000 to create the equivalency process. The equivalency process consists of 3 exams: the assessment of fundamental knowledge (AFK), the assessment of clinical judgement (ACJ), and the national dental examination of clinical competency (NDECC). After passing these exams, a participant can move on to the certification exams.

The framework in theory sounds reasonable. In practice, there are issues that need to be addressed. The opportunity to attempt these exams is the first barrier. For some people, they have waited years to

attempt these exams. COVID has played a role in this. Exam cancellations have affected internationally trained dentists more than Canadian graduates because some Canadian dental schools would not allow the equivalency exams to take place at their schools. Restrictions also prevented the NDEB from using hotels or conference centers to host the exams. These cancellations have created a backlog for each exam. The AFK and ACJ exams were digitized so they could be offered at prometric centers going forward. The AFK exam can be offered in a paper and digital format for the time being to help clear the backlog. The ACJ exam can only be offered at prometric centers. Capacity will be an issue as they are limited by the capacity at the prometric centers. The NDEB claims that they can only offer the exam twice a year because it takes them 6 months to create an exam. The NDEB could not give us a solution to this problem at this time. Capacity should not be an issue for the NDECC exam because the NDEB built a dedicated center to host the exam. They claim that center will be open in June 2022.

Fairness is the second barrier that we face. Fairness is a difficult word to define so I will use the definition listed on the Office of the Fairness commissioner website. Empathy is highlighted. Many internationally trained dentists suffer greatly going through this process. The immense stress leads to mental health issues. Many ITDs state that they feel anxious or depressed. The pressure puts a strain on their families. The cost of the process can be upwards of 50-100 thousand dollars for many ITDs. They must work minimum wage jobs just to survive here.

“Assessments must be rational and above board, and not place unnecessary and ill-conceived obstacles in the way of success.” We have presented exam specific issues to the NDEB. We hope that they will address them, but it is unclear at the moment.

“Everyone must have the same prospects irrespective of their country of origin or background.”

Statistics show the internationally trained dentists are less likely to work as dentists in Canada when compared to Canadian graduates. This point also leads to the discussion about standard setting. A series

of extra exams for us to complete is a fair request so long as those exams are fair. The passing standard for the equivalency exams is defined as “the minimal competency of a recent Canadian graduate”. This means that 100% of Canadian graduates should be able to pass these exams. The historical passing rates for the equivalency exams are roughly 40%. We asked the NDEB if they believe these passing rates are reflective of our competency. The response was that they believe that this is an accurate reflection of our competency. We believe that 100% of Canadian graduates would not be able to pass these exams. We have requested that the NDEB perform a study to test a sample of Canadian graduates on the equivalency exams to determine if the standards that they have set are fair. The response from the NDEB so far has been to say that testing Canadian graduates on the equivalency exams would not be an accurate representation because they claim there are big problems when comparing the two groups. We are insisting on this because there may be bias in their standard setting system. Standard setting is done by examiners, most of whom are Canadian graduates working at Canadian dental schools. It is possible that there is a level of unconscious bias against internationally trained dentists when setting the standards for the equivalency exams. We asked the NDEB this question and they did not refute the possibility of bias in their standard setting system. They mentioned that there are licensed dentists who have contacted the NDEB and questioned what they are doing with the equivalency process. We can not provide evidence of this bias but there are enough anecdotes and stories to be concerned about its existence. We are requesting that the NDEB complete the study to remove the possibility of bias in their standard setting system. The alternative to this is to remove the equivalency process and allow internationally trained dentists to attempt the certification exams. It is unclear why the certification exams are not sufficient to assess our competency. If this is true for us, this must also be true for Canadian graduates.

The Canadian Occupational Projection System shows that there will be a shortage of 5000 dentists in Canada by 2028. Rural areas of Ontario will be hit the hardest because there is already a shortage of

dentists in rural areas. This number does not account for the impact of COVID-19. A majority of new dentists in Ontario are internationally trained. In 2020, 237 new dentists in Ontario were internationally trained vs 208 Canadian trained dentists. This number will continue to grow as Canadian dental schools are unable to keep up with the demand for dentists in Canada. The shortfall of dentists will have to be filled by internationally trained dentists. Many of those dentists are already in Ontario but are unable to work because of the barriers they face. A lack of dentists means that there will be patients who will not be able to access a dentist in a timely manner. This will affect the oral health of people across Ontario.

We have been in contact with the Office of the Fairness Commissioner. There was a question as to whether the NDEB falls under their jurisdiction. I cite the 1991 case, NDEB v Ontario Human Rights Commission. The decision in this case was that the NDEB falls under both federal and provincial jurisdiction. Therefore, the NDEB should abide by the policies set by the Office of the Fairness Commissioner.

I spoke to Daniel Faulkner, the CEO for the RCDSO. I asked if there could be an option for an alternative licencing pathway for internationally trained dentists in Ontario. He dismissed the idea at the time.

The public safety argument appears to be the issue when discussing the inclusion of healthcare workers in this bill. First, we must address the assumptions made when this issue is discussed. There is an assumption made that internationally trained dentists are less competent because they are internationally trained. There is also the assumption that Canadian trained dentists are more competent because they are Canadian trained. The same amount of scrutiny and standards need to be applied to both groups. We acknowledge the importance of public safety and agree that not everyone is qualified to be a dentist in Canada. We just want a fair assessment of our competency.

The problem we face is that there is little oversight over organizations like the RCDSO or the NDEB.

When people like us face issues with the registration process, there is little we can do to address them.

We believe that this bill can be a valuable tool in addressing this issue. We propose that there be an

appeals body in the Office of the Fairness Commissioner that can address issues like this. And we

propose that the Office of the Fairness Commissioner be given the power to impose consequences on

organizations that are found to be non-compliant with their principles.