

April 30, 2025

Executive Summary

Speech-Language & Audiology Canada (SAC) supports the Ministry of Health's efforts to improve labour mobility and reduce regulatory barriers for health professionals. Representing over 6,500 members, SAC advocates for policies that balance workforce flexibility with high standards of care.

SAC acknowledges increasing demand for speech-language pathology and audiology services and endorses streamlined registration for qualified professionals, provided public safety and professional standards are upheld.

Key principles include:

- National standardization of CETP exam
- Simplified interjurisdictional registration
- Protection of public safety and professional standards
- Ongoing regulatory collaboration
- Sustainable workforce planning

The Cross Provincial Practice Certificate (CPP), enabling speech-language pathologists (S-LPs) and audiologists in four provinces to serve Ontario patients, is a positive step - especially for virtual care - but further progress is needed.

SAC remains committed to collaborating with stakeholders to develop solutions that reduce barriers while ensuring accountable, high-quality care.

Submission to the Ministry of Health request for consultation on *Reducing Barriers to Practice and Enhancing Labour Mobility for Regulated Health Professionals Registered in other Jurisdictions*

SAC commends the Ontario Ministry of Health for proposing this action and support initiatives that will help to improve labour mobility for S-LPs and audiologists across Canada.

As the national body representing these professions, we appreciate the opportunity to provide comments on the “Reducing Barriers to Practice and Enhancing Labour Mobility for Regulated Health Professionals Registered in other Jurisdictions”.

Current Registration Processes:

Each province in Canada has their own regulatory body with unique requirements for licensure. This creates inconsistencies in credential recognition, application processes, documentation and timelines. For S-LPs and audiologists already registered and in good standing in a province other than Ontario, these differences may lead to:

- Uncertainty regarding professional roles and responsibilities due to varying scope of practice definitions across jurisdictions
- Delays in practice readiness due to administrative burden
- Uncertainty regarding professional competencies due to inconsistent requirements for licensure to include passing the Canadian Entry to Practice (CETP) exam

Patient Safety and Quality of Care (Positive Impacts):

Expanding “As of Right” to Additional Out-of-Province Regulated Health Professions:

- Increasing the supply of qualified S-LPs and audiologists available to serve Ontario, including rural, remote, and Indigenous communities
- Expanding access to essential services such as early hearing detection and intervention and rehabilitation services following stroke
- Reducing time consuming licensing steps to fill workforce gaps in rural and remote areas
- Enabling more S-LPs and audiologists to deliver virtual care to Ontario patients, in areas lacking local specialists

Removing current practice restrictions would mean:

- More flexible distribution of S-LPs and audiologists into community settings where service gaps exist
- Strengthening the potential of community-based multidisciplinary models of care

Automatic Recognition of Licensure from Another Province would mean:

- Reducing barriers to practice for S-LPs and audiologists to support a national health system
- Simplified application process for professionals to serve patients sooner
- Reduced wait times for speech, language, hearing, balance, and swallowing service

Protecting Patient Safety & Quality of Care**Expanding “As of Right” to Additional Out-of-Province Regulated Health Professions**

- *Risk:* Different speech-language pathology and audiology scope of practice standards across the country presents the risk of professionals stepping outside their scope of practice
- *Mitigation:* Ensuring Ontario regulators have sufficient time and resources to conduct thorough background and credential checks

Automatic Recognition of Licensure from Another Province

- *Risk:* Unintended scope violation due to varying scope of practice standards
- *Mitigation:* Supports to familiarize professionals with Ontario practice standards

Benefits and Risks for Patients and Health Professionals**Expanding “As of Right” to additional out-of-province regulated health professions means:**

- Easier access to consistent communication healthcare across the country for patients moving between provinces or those receiving care while traveling

Removing current practice restrictions allows for:

- The expansion of virtual and community-based care models in rural and remote areas
- Flexible multidisciplinary care approaches to utilize the expertise of S-LPs and audiologists

Automatic Recognition of Licensure from Another Province means:

- Patients can receive consistent care when mobile from licensed S-LPs and audiologists

Implementation:**Expanding “As of Right” to additional out-of-province regulated health professions:**

- Ontario’s scope restrictions for S-LPs and audiologists must be reviewed to align with other jurisdictions
- Standardized licensing (e.g., CETP exam) for labour mobility and competency expectations

Removing current practice restrictions:

- Lifting restrictions will improve access to speech-language pathology and audiology services within the community and virtual care settings to meet patient needs

Automatic Recognition of Licensure from Another Province

- National adoption of the CETP exam would ensure that professionals moving between provinces meet the same entry-to-practice competency standards

What supports would regulated health professionals from another province or territory or U.S registered physicians and nurses need to help with the transition to practising in Ontario?

To ensure a smooth and safe transition into Ontario's health system, S-LPs and audiologists from other jurisdictions would benefit from:

- National guidance documents on scope of practice and public awareness resources
- The creation of a centralized database of licensed S-LPs and audiologists across the country to help streamline the vetting process
- Facilitation of mentorship programs and connections to professional communities in Ontario
- The adoption of the CETP exam as part of the licensing process nationally, to ensure fairness for applicants and confidence in professional competence and patient safety across Canada

These supports would ensure patient safety, professional standards, and system integration are improved and upheld. As the national association representing S-LPs and audiologists, SAC is well-positioned to work with CASLPO and the Ministry to lead the development of these tools and ensure their effective implementation.

We firmly believe that S-LPs and audiologists, as regulated health professionals, would benefit from targeted supports for a smooth transition to begin practicing in Ontario. These supports would help to ensure patient safety, professional standards, and system integration are improved and upheld. As the national association representing these professions, SAC would gladly take the lead, on organizing the following supports:

- National guidance documents on scope of practice and public awareness resources
- The creation of a centralized database of licensed S-LPs and audiologists across the country to help streamline the vetting process
- Facilitation of mentorship programs and connections to professional communities in Ontario
- Supporting the adoption of the CETP exam to ensure fairness for applicants and confidence in professional competence and patient safety across Canada

We encourage the Ministry to work in close collaboration with SAC and CASLPO to discuss risk mitigation strategies and develop structured and sustainable support systems for incoming professionals.