



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

September 27, 2022

Nancy Naylor
 Deputy Minister
 Ministry of Education
 438 University Avenue, 5th Floor
 Toronto ON M7A 2A5

Dear Deputy Minister Naylor,

Since 2020, there has been a steady and persistent shortage of Ontario Certified Teachers (OCT) in the province's classrooms, contributing to immense pressure on the education sector.

As the chart below illustrates, the College has certified more teachers in the first three quarters of 2022 than in recent years:

| | Jan-Aug 2022 | Jan- Dec 2021 | Jan-Dec 2020 | Jan-Dec 2019 |
|--|--------------|---------------|--------------|--------------|
| Total Certificates issued (General, Temporary, Transitional) | 5,906 | 5,749 | 5,825 | 5,525 |

While the Ontario College of Teachers has issued a record number of certificates this year, we recognize that more work needs to be done.

As such, we assembled an emergency taskforce to create an *Action Plan* that will continue to address Ontario's teacher shortage while fulfilling our mandate to protect student safety and well-being. Enclosed with this letter is a comprehensive document (*appendix*) that provides greater detail for each component of the *Action Plan*.

It is important to note that this extraordinary situation, where there is a shortage of qualified professionals, is occurring in many jurisdictions and across numerous professions.

Situation recap

In the last year, the College initiated and implemented responsive measures aimed at addressing the teacher shortage. These internal initiatives include, but are not limited to:

- Expediting applicants who have employment offers.
- Prioritizing applicants from jurisdictions where certification is the likely outcome for labour mobility, French, and technological education applicants
- Processing applicants where only one document remains outstanding before the application is complete.
- Streamlining the process for applicants likely to be certified.

Purpose of the Action Plan

The College recognizes the important role faster certification can play in alleviating the teacher shortage. We remain committed to processing and issuing certificates expeditiously for all qualified teacher candidates who meet certification requirements.

Our *Action Plan* can play a role in addressing the teacher shortage by enhancing application and certification efficiency. Our plan has four goals:

1. Expedite certification process
2. Provide timely service-oriented applicant experience
3. Remove barriers to certification
4. Expand teacher supply

A sustainable and measured approach

We are taking a sustainable and measured approach that will have both immediate and long-term benefits for Ontario's education system. Some are **temporary** measures to address the shortage more quickly, while others require **long-term** planning and execution.

There are **seven** core components to our *Action Plan*:

- 1. Introducing alternative certification pathways for teaching professionals by:**
 - Creating a new Provisional Certificate for internationally educated teacher (IET) applicants that would enable this group to be ready for hire by school boards.
 - Expanding the Provisional Certificate to individuals on Letters of Permission (LOPs).
- 2. Reducing service times and enhancing the applicant experience by:**
 - Increasing the College's technical capabilities by offering additional self-serve options and real-time solutions.
- 3. Removing procedural barriers and streamlining assessment procedures by:**
 - Simplifying the certification process for applicants who have completed an Ontario program.
- 4. Leveraging technology to adopt a modern, easy-to-use, fully digital application process and client experience by:**
 - Enabling applicants to submit more documents digitally.
- 5. Re-imagining professional requirements for certification by:**
 - Reducing the minimum requirements for professional education in order to be certified with conditions while maintaining the standards of the teaching profession.
 - Refocusing the fourth semester of the teacher education program to be employment-based, in-classroom experience.
- 6. Building on the Temporary Certificate program by:**
 - Extending the Temporary Certificate program to the 2022-2024 cohort, which would keep the program open until June 30, 2025
- 7. Leveraging stakeholder support by equipping them with accurate and current information by:**
 - Collecting new data from members annually.

As mentioned, the attached appendix provides greater detail for each component of the *Action Plan*, including timelines for implementation and forecasting.

By adopting these measures, we anticipate returning to our standard service levels by the first quarter of 2023. This includes timelines of 30 days for processing documents; 30 business days to issue registration decisions for Ontario graduates and labour mobility applicants, and international applicants eligible for a provisional certificate.

Please note these timelines can only be achieved if we have received all required information.

However, our forecasted goals are contingent on external factors outlined below, as well as the approval of the 2023 budget.

Considerations, challenges and proposed collaboration

There are some environmental and legislative considerations that would have a direct impact on our *Action Plan*. To alleviate the teacher shortage, these elements require support from the Ministry of Education and cooperation from other education stakeholders.

An exemption from *FARPACTA* regulations

An immediate consideration is temporarily exempting the College from recent amendments to the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)*. Eighty-one per cent of successful applications for membership represent individuals who completed an accredited teacher education program in Ontario. However, this large group is not covered by the new regulations under *FARPACTA*.

The *FARPACTA* regulation would force the College to stop prioritizing applications from individuals who:

- Have received job offers from school boards.
- Hold qualifications to address severe shortages in areas such as French Language education, FSL, and technological education.

In the last year, the College has been able to prioritize these applications, resulting in the placement of more OCTs in Ontario's classrooms. Unless these applicants are certified outside Ontario, their applications will now take second place while the College processes applications that are protected by the *FARPACTA* regulations. The College will not be able to deviate from this order without risking a compliance order from the Ontario Fairness Commissioner.

The *FARPACTA* changes may also inadvertently create more unsuccessful candidates since the College will no longer be afforded the time to seek missing information or assist applicants in other ways. In other words, the College will be obliged to send a certification denial letter in order to have made a "certification decision" in accordance with *FARPACTA* timelines, rather than working with the applicant to obtain required documentation as is the case today.

We ask that the Ministry of Education reach out to the Ministry of Labour, Immigration, Training and Skills Development (MLITSD) and the Office of the Fairness Commissioner to support the College's request for exemption. The College has begun consultation with the MLITSD and has requested a temporary exemption to allow us the flexibility to implement measures that support our contribution to alleviating the teacher shortage. Recognizing that teacher demand

and supply is cyclical, we have asked that the MLITSD provide regulatory language to allow professions the opportunity to reassess every five years.

Continue to ensure only qualified individuals can teach

It is important to distinguish the unique nature of the teaching profession in comparison to other regulated professions. With respect to certification, the College abides by the requirements set out in legislation. We rely strictly on an applicant's academic and/or technological qualifications to determine whether they have met the requirements for certification. The required documents for certification, while mandated in law, are the foundation of the assessment process.

Since the teaching profession does not have an entry-to-practice examination, any lessening of requirements related to documents and/or qualifications could compromise our capacity to confirm applicants have all necessary qualifications and training to competently teach in publicly funded classrooms.

A complex ecosystem with many stakeholders

Ontario's education system is a collaborative space and addressing the current shortage of teachers requires a collective solution. The College is committed to working with all stakeholders to help alleviate the teacher shortage while maintaining the standards of the profession.

Each of our recommendations will require collaboration to yield the desired outcomes. For example, some elements of our *Action Plan* will require legislative or regulatory amendments before the College can move forward. We will look to the Ministry, when necessary, to support the College's *Action Plan* with those amendments.

Additional considerations

The College has several considerations that have not been included in the *Action Plan* as these items are primarily driven by other stakeholders.

For example, the multi-session pathway is an under-utilized delivery model for initial teacher education, used only by a limited number of faculties of education.

In this model, teacher candidates who have completed a combination of coursework and 10 days of practicum may be eligible for a transitional certificate that makes newly certified teachers available to classrooms sooner.

Should there be the momentum to incentivize offering these multi-session programs instead of the more traditional consecutive program, it would support an expedited supply of certified teachers to the sector. For its part, the College would commit to prioritizing the accreditation of new multi-session programs as part of its recommendations to expand teacher supply. However, other stakeholders would have corresponding responsibilities to prioritize the mobilization of this model.

Another example is the hiring of OCTs. While the College can increase the supply of OCTs available, hiring falls under the purview of employers.

Our records indicate that there are more than 70,000 OCTs in Good Standing – many of them internationally educated teachers – who are not employed by a publicly funded school board. Out of these members, 3,848 have French qualifications and 6,405 have French as a Second Language qualifications.

For its part, the College could facilitate access to these members, and other stakeholders could work together to attract these OCTs into teaching in the public system. Moreover, there needs to be an acknowledgement by employers of equal value for all certificates of qualification; general, transitional, temporary, and provisional.

A dynamic and evolving plan

The College's *Action Plan* is not meant to be exhaustive. It is intended to provide an initial overview of our recommended action.

Additionally, it is a dynamic, iterative document that we will reassess and adjust according to labour market conditions. This will help ensure that its goals are continuously addressed and refined.

A history of collaboration and a commitment to continuous improvement

Since 1997, the College has, through regulation, worked diligently to support the province's education system. Our commitment to continuous improvement has enabled us to adapt to the ongoing evolution of Ontario's education system, including the ebb and flow of teacher labour supply since our inception.

The *Action Plan* reflects our mandate and dedication to protect the public interest. It also embodies our vision of how the College can be instrumental to addressing Ontario's teacher shortage.

We look forward to collaborating with the Ministry and other education stakeholders to bring our shared goals to fruition.

Sincerely,



Diana Miles
Chair of Council



Chantal Bélisle, OCT
Interim Registrar and Chief Executive Officer

Cc: Phil Graham, A/Assistant Deputy Minister, Strategic Policy and Planning Division, Ministry of Education
Anshoo Kamal, Strategic Policy and Education Workforce Branch, Ministry of Education

APPENDIX I

ONTARIO COLLEGE OF TEACHERS' ACTION PLAN

The following document provides insight into the College's *Action Plan*.

COMPONENT 1: INTRODUCING ALTERNATIVE CERTIFICATION PATHWAYS FOR TEACHING PROFESSIONALS TO ENSURE EQUITABLE AND FAIR ACCESS TO THE LABOUR MARKET

Recommendation

Create a new classification of certificate for internationally educated teacher (IET) applicants that would enable this group to be ready for hire by school boards.

The five-year **Provisional Certificate** is aimed at capitalizing the years of teaching experience that IETs bring to the table. This recommendation is **not** meant to exempt these applicants from submitting a complete application or undergoing an evaluation against the full requirements for certification.

Rather, it would provide eligible applicants with the opportunity to teach in a classroom while waiting for a full registration decision. Applicants would still be required to provide a complete application before they can be considered for a Provisional Certificate.

To be eligible, applicants would need to:

- Demonstrate at least five years of successful teaching experience as a certified teacher in the last 10 years, at least four months of which were continuous.
- Meet the professional suitability requirement.

In addition, Provisional Certificate holders would be required to complete the New Teacher Induction Program (NTIP), or the Orientation to Teaching in Ontario Additional Qualification.

The certificate holder would choose the program based on accessibility and availability. They must also submit a satisfactory performance appraisal in the first year of employment. Notwithstanding the verified years of experience obtained as a certified teacher in another jurisdiction, these additional requirements are an added layer of student protection.

Provisional Certificates could be converted into a General Certificate of Qualification and Registration (CQR) if the holder's evaluation shows they have met the academic, minimum professional program, and language proficiency requirements.

Our projections show that 315 applicants in the queue *may* be eligible to apply for a Provisional Certificate. This number is an estimate as not all applicants will meet the eligibility criteria.

Once an application is complete and all documents related to the Provisional Certificate have been received, a decision on the Provisional Certificate can be expected in 30 business days.

As with many of the recommendations set out below, employers should be encouraged to promote diversity by hiring Provisional Certificate holders. Since no teaching qualifications will be assigned on the certificate, they should also carefully review the applicant's qualifications.

Recommendation

Expand the Provisional Certificate for individuals on Letters of Permission (LOPs)

Like the Provisional Certificate proposed for IETs, this recommendation is an intended pathway to certification for teachers on LOPs by recognizing their years of teaching experience in Ontario schools.

The Ministry of Education grants an LOP to a school board, allowing the board to hire a non-certified teacher for specified subjects/courses for the school year. Often this pathway is used to address a specific deficiency (geographic challenges, subject expertise, etc.). This pathway would allow for formal recognition of their responsibilities, and as members of the College, Provisional Certificate holders would fall under the College jurisdiction and be required to meet the ethical and professional standards of the profession, including the professional conduct regulation.

To be eligible, applicants would need to:

- Demonstrate at least five years of successful teaching experience on an LOP in the last 10 years, verified by an appropriate supervisory officer, with at least four months of continuous teaching
- Meet the professional suitability requirement.

Provisional Certificates would be valid for five years and within their first year of employment, holders would be required to submit a satisfactory performance appraisal as an additional layer of public protection. Provisional Certificates could be converted into a General CQR if applicants provide evidence that they have met the academic, minimum professional program, and language proficiency requirements. It is assumed that these holders will be completing these requirements while holding the Provisional Certificate.

Please note these individuals would be expected to satisfy the academic, minimum professional program, and language proficiency requirements.

The College will require specific data from the Ministry regarding individuals on LOPs to fully assess the impact of this recommendation.

Goals

- | | |
|---|--|
| <input checked="" type="checkbox"/> Expedite certification process | <input checked="" type="checkbox"/> Remove barriers to certification |
| <input type="checkbox"/> Provide timely, service-oriented communication | <input checked="" type="checkbox"/> Expand teacher supply |

Timelines

- | | |
|--|---|
| <input type="checkbox"/> Immediate (0-3 months) | <input checked="" type="checkbox"/> Short-term (3-6 months) |
| <input type="checkbox"/> Medium-term (6-12 months) | <input type="checkbox"/> Long-term (12 months – beyond) |

The College will work with the Ministry on amending *Ontario Regulation 176/10*.

Should Council approve the proposed regulatory amendment, the College will begin working on the back-end activities related to the new Provisional Certificate (for example: IT, training for Membership Services staff, etc.) while informing applicants with complete applications of the new certificate.

COMPONENT 2: REDUCING SERVICE TIMES AND ENHANCING THE APPLICANT EXPERIENCE

The volume of complaints to the government and media is expected to be reduced when client queries are addressed.

Recommendation

Increase the College’s technical capabilities by offering additional self-serve options and real time solutions.

Client queries and complaints have been a primary theme of public critiques of the College. Frustrated clients have been trying to find other means to reach us. These recommendations directly address this issue.

We strongly encourage applicants and members to use self-serve options wherever possible. This is the timeliest and most accurate way for clients to get real-time updates as to where they are in the process, as well as current published processing timelines and other updates. The College will begin publishing our processing timelines for applications for certification and other services that we offer so that clients are aware of in real time where they are in the process. We expect this will significantly reduce the volume of inquires we receive.

With the support of appropriate resources, the College can begin filtering and addressing the service tickets currently in our queue.

In addition, live chat is now a mainstay in the client service industry. Compared to phone or email service channels, live chat has been shown to cost less, boost productivity and improve overall client satisfaction. The College will develop a live chat function, which will be available during business hours (with flexible hours during peak times), and allow Client Services representatives to handle three to five chats at one time. During peak times, the College could draw upon cross-departmental resources to address simple inquiries, providing Client Services representatives with additional capacity to respond to complex issues.

Goals

- | | |
|--|---|
| ✓ Expedite certification process | <input type="checkbox"/> Remove barriers to certification |
| ✓ Provide timely, service-oriented communication | <input type="checkbox"/> Expand teacher supply |

Timelines

- | | |
|-----------------------------|----------------------------------|
| ✓ Immediate (0-3 months) | ✓ Short-term (3-6 months) |
| ✓ Medium-term (6-12 months) | ✓ Long-term (12 months – beyond) |

Some aspects of these recommendations can begin immediately.

However, the live chat function and restructuring of Client Services will require substantial planning and resources.

COMPONENT 3: REMOVING PROCEDURAL BARRIERS AND STREAMLINING ASSESSMENT PROCEDURES

The recommendation under this component is aimed at streamlining assessment procedures to reduce decision timelines and annual denials, which will enable applicants to join the labour market more quickly.

Recommendation

Simplify certification for applicants who have completed an Ontario program.

The College currently evaluates all Canadian and international technological and academic qualifications. These evaluations can delay the certification process and may lead to a denial despite the applicant having completed a professional program in Ontario.

Under this recommendation, we would no longer verify academic or technological qualifications from graduates who completed an accredited teacher education program in Ontario. This recommendation is consistent with how other Ontario graduates are processed: they do not pay an evaluation fee and no verification of their qualifications takes place.

The presumption is that graduates would have met the necessary academic/technological requirements to be admitted into the professional program at a faculty of education in Ontario.

In addition, any risk to the public would be mitigated by these applicants having successfully completed a College-accredited four-semester teacher education program, including the practicum. Membership Services would only review the academic and technological credentials of teachers who completed their teacher education, and were certified, outside Canada.

These academic and/or technological qualifications will not be recorded on the certificate or the public register since the College will not be verifying them. Should members wish for these qualifications to appear on the public register/certificate, they could pay a fee and request an evaluation later in the process.

In 2021, the Evaluation Services unit conducted degree verifications of 765 credentials for 481 Ontario graduates. In other words, 481 applications from Ontario graduates were issued a certification decision beyond 30 business days because their international qualifications underwent a degree verification.

This proposal may prevent an average of four applicants from being denied annually and allow an average estimate of 450 additional teachers to be certified within 30 days of the College receiving a complete application.

Goals

- ✓ Expedite certification process
- Provide timely, service-oriented communication
- ✓ Remove barriers to certification
- ✓ Expand teacher supply

Timelines

- ✓ Immediate (0-3 months)
- Medium-term (6-12 months)
- Short-term (3-6 months)
- Long-term (12 months – beyond)

Should Council approve the proposed recommendation, a proposal to amend the bylaws with respect to the information recorded on the public register will follow. The College will also work with the Ministry on amending *Ontario Regulation 176/10*. The College will amend their evaluation practices shortly thereafter and communication materials will be disseminated to applicants and stakeholders who would normally rely on the information found on the certificate/public register.

COMPONENT 4: LEVERAGING TECHNOLOGY TO ADOPT A MODERN, EASY TO USE, FULLY DIGITAL APPLICATION PROCESS AND CLIENT EXPERIENCE

Recommendation

Enable applicants to submit more documents digitally.

Before the pandemic, the College received most documents by mail. Currently, clients email certification-related documents to Client Services as attachments. Since the existing system has no way of distinguishing application documents from general queries, it is difficult to triage using current technology.

This recommendation is for the College to introduce a fully digital environment. For example, the College would create a portal where members and applicants could upload documents (i.e., certifications, qualifications, etc.) directly into the College's system, rather than giving them the option to email or provide paper copies. They will receive immediate confirmation re: delivery, which would eliminate any need for them to follow-up with the College.

Currently, approximately one third of service tickets are emails related to documents submitted by applicants. The College receives an average of 1,850 document-related service-related tickets per month. This recommendation would free up 30 per cent of staff resources and enable Client Services to focus on other certification issues instead.

This would also reduce the amount of time required for client documents to be reviewed by our staff.

The College has already entered into agreements to start accepting electronic transcripts directly from verified third parties. We would continue to explore similar solutions for other required documents. For example, the criminal record check report is often the last document submitted by an applicant.

We would explore an agreement with a third party who conducts background checks and would initiate these checks on behalf of the applicant. Given the volume of criminal record check (CRC) reports required, we could negotiate a lower rate than what applicants are required to pay when they request a report individually.

Alternatively, applicants who do not consent to this process could arrange to provide an electronic CRC themselves.

Goals

- ✓ Expedite certification process
- ✓ Provide timely, service-oriented communication
- ✓ Remove barriers to certification
- Expand teacher supply

Timelines

- ✓ Immediate (0-3 months)
- ✓ Medium-term (6-12 months)
- Short-term (3-6 months)
- Long-term (12 months – beyond)

The Information Technology unit will require some resources and dedicated staff time for just this project.

COMPONENT 5: RE-IMAGINING PROFESSIONAL REQUIREMENTS FOR CERTIFICATION

Recommendation

Reduce the minimum requirements for professional education in order to be certified with conditions while maintaining the standards of the teaching profession.

Under this proposal, applicants could be certified with conditions after successfully completing a program of professional education of at least one semester/15 credits and 10 days of practicum. They must also be prepared to teach a minimum of one teaching division.

The current regulation sets the minimum requirements at one year (the regulation is silent on the minimum number of practice teaching days). The missing requirements will be recorded as conditions on the certificate.

This recommendation will mainly impact internationally educated applicants and will enable them to meet our certification requirements.

With a lower minimum requirement for a teacher education program, more applicants will be eligible for the certificate. Moreover, this recommendation aligns with the current certificates available for Ontario graduates: Ontario teacher candidates are already eligible for a 1) Temporary Certificate, after making satisfactory progress in their program and completing a satisfactory portion of their practicum, or a 2) Transitional Certificate, after one session/12 credits and a minimum of 10 days of practicum.

Recommendation

Refocus the fourth semester of the teacher education program to be employment-based, in-classroom experience.

Responding to a request from certain stakeholders, this recommendation would enable faculties of education to review their program structure whereby the fourth semester would focus on in-classroom experience.

With the eventual sunset of the Temporary Certificate, the recommendation would formalize the employment portion into the teacher education program. Faculties would have full control of how the program is designed, which will be beneficial for faculties who may have been previously hesitant to recommend teacher candidates for a Temporary Certificate.

To align with the re-imagined Ontario program, IETs could meet the full registration requirements with a minimum of three semesters of teacher education coursework (along with 80 days of practicum), which will increase the number of potential new certified teachers.

Goals

- Expedite certification process
- Provide timely, service-oriented communication
- Remove barriers to certification
- Expand teacher supply

Timelines

- Immediate (0-3 months)
- Medium-term (6-12 months)
- Short-term (3-6 months)
- Long-term (12 months – beyond)

The College will also work with the Ministry on amending *Ontario Regulation 176/10*. Should Council approve the proposed regulatory amendment, the College can amend their evaluation practices accordingly and communicate the changes to applicants.

The College will support faculties in redesigning their programs.

COMPONENT 6: BUILDING ON THE TEMPORARY CERTIFICATE PROGRAM

Recommendation:

Extend the Temporary Certificate program to the 2022-2024 cohort, which would keep the program open until June 30, 2025.

When the eligibility of Temporary Certificates was expanded to the 2021-2023 cohort, most faculties recommended their teacher candidates after they successfully completed two semesters (one year) of their program.

Based on the numbers seen from this expansion, more than 500 new Temporary Certificates could be issued to teacher candidates by the time they enter their second academic year of their teacher education program. Under this recommendation, current Temporary Certificate holders due to expire on December 31, 2023, should also be granted an extension until June 30, 2024.

The infrastructure for processing and converting Temporary Certificates is in place, and applicants can expect their applications to be processed within 30 business days after submitting a complete application.

Goals

- | | |
|---|------------------------------------|
| <input type="checkbox"/> Expedite certification process | ✓ Remove barriers to certification |
| <input type="checkbox"/> Provide timely, service-oriented communication | ✓ Expand teacher supply |

Timelines

- | | |
|--|---|
| <input type="checkbox"/> Immediate (0-3 months) | ✓ Short-term (3-6 months) |
| <input type="checkbox"/> Medium-term (6-12 months) | <input type="checkbox"/> Long-term (12 months – beyond) |

The College will work with the Ministry on amending *Ontario Regulation 176/10*. Should Council approve the proposed regulatory amendment, the College's infrastructure to process and issue temporary certificate is in place.

COMPONENT 7: LEVERAGING STAKEHOLDER SUPPORT BY EQUIPPING THEM WITH ACCURATE AND CURRENT INFORMATION

Recommendation

Collect new data from members annually.

College records indicate there are more than 70,000 Ontario Certified Teachers in Good Standing, many of them internationally educated teachers, who are not currently employed in the Ontario public school system. Out of these members, 3,848 have French qualifications and 6,405 have French as a Second Language qualifications.

However, we do not know why they have maintained their Good Standing status (some could be working in non-teaching roles in the education sector or could be teaching in private/independent schools). This is a typical scenario where pursuing the recommendation would enable the College to reach out to specific members who may be interested in returning to the profession.

College bylaws require that applicants and members provide up-to-date personal information within 30 days. However, members do not always report when there are changes to their information. With every regulatory change or change in practice that requires the College to contact the membership, staff spend considerable time following up with members whose information on file is not accurate.

For example, when the Sexual Abuse Prevention Program was implemented, our Client Services team was inundated with calls and emails since members could not remember the email address they used to sign into their member's account to access the program.

Current information would provide the College with the best methods to reach membership, alongside an understanding of employment trends, demographics etc.

Goals

- Expedite certification process
- Provide timely, service-oriented communication
- Remove barriers to certification
- Expand teacher supply

Timelines

- Immediate (0-3 months)
- Medium-term (6-12 months)
- Short-term (3-6 months)
- Long-term (12 months – beyond)

Should Council approve the proposed recommendation, the College can communicate with its membership. The College could coincide the collection of data with the annual membership fee reminder later this year.

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