

BRIEFING NOTE

TO: Board of Directors

FROM: Derick Summers, Chair, Registration Committee

DATE: December 1, 2025

SUBJECT: Registration Appeals Panel Policy
Appendix A: Registration Appeals Panel Policy (Current & marked with changes version)
Appendix B: Registration Appeals Panel Policy (Clean & proposed updated version)

☒ For Decision

☐ For Information

☐ Monitoring Report

Purpose:

To consider approval of proposed updates to the Registration Appeals Panel policy, following a scheduled content review by the Registration Committee.

Background:

The Registration Committee carries out a regular review of all public-facing policies to ensure they remain accurate, relevant, and aligned with the College's current processes. The following policy is being brought forward to the Board following a scheduled content review by the Committee.

The Registration Appeals Panel is in place to review any appeals filed where the an initial panel of the Registration Committee makes a decision exercising their power under section 18(2) or 19(6) of the [Health Professions Procedural Code](#). A policy detailing the registration appeals process was created in 2012 and it has not been reviewed since.

Appeals are rare but it is best practice to have a robust policy in place should the need arise.

For Consideration:

The current policy with visible tracked changes is attached as Appendix A and the proposed clean version of the policy is attached as Appendix B so that the Board can view what edits are being proposed.

The proposed language changes in the Registration Appeals Panel (RAP) aim to make the language more accessible. The policy was also clarified so that an applicant could understand what is involved in the appeal process.

The Committee agreed that the proposed language changes allow the policy to be better understood by someone with no legal background and helps to clarify the appeal process for all parties.

The Committee recommends that the Board approve the proposed changes.

Public Interest Considerations:

The Committee considered that the proposed updates to the language in this policy should help a member of the public or an applicant or registrant easily understand the appeal process for registration decisions.

Diversity, Equity and Inclusion Considerations:

The Committee considered that the adjustment in language and clarity of these proposed changes will make it more accessible to applicants without a legal background. It lays out what applicants can expect and what is expected of them should they file an appeal.

This appeal process also allows applicants to use a more cost effective and timely process in having their provisional registration decision be reviewed.

Risk Management Considerations:

The Committee recognizes that a second set of eyes is often beneficial if an applicant disputes the provisional decision. The proposed changes around language clarity in this policy ensures that the Registration Committee is administering the process in a just and fair manner.

Action Required:

That the Board approve the proposed updates to the Registration Appeals Panel policy or order a further review.



REGISTRATION POLICY

Registration ~~Appeal~~Appeals Panel

The Registration Committee (~~the Committee~~) is composed of two panels. ~~Decisions~~One panel (the First Panel) reviews and issues decisions, and the Registration Appeals Panel (RAP) hears appeals of the Committee that eligible registration decisions.

Not all registration decisions are appealable to the Health Professions Appeal and Review Board (HPARB) under the RAP. Decisions are subject to the process set out herein. For these matters, the first appealable if the First Panel makes a provisional decision which can then be appealed, if the applicant requests, to the second Panel, the Registration Appeal Panel (the RAP). Decisions an order under section 18(2) or 19(6) of the first Health Professions Procedural Code. All other decisions of the First Panel that are not appealable to HPARB are also not appealable to the RAP and and become final orders of the Registration Committee.

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Composition

1. The RAP shall be composed of a minimum of 3 members with,
2. at least one Director of the Board who is a registrant of the College;
3. at least one Director of the Board appointed to the Board by the Lieutenant Governor in Council; and
4. if the Board so decides, up to three registrants of the College who are not a Director of the Board.

No member of the ~~first~~First Panel shall be a member of the RAP. Three members of the RAP constitute a quorum.

Process for Appeal

Applicants whose provisional decisions are eligible for appeal to the RAP will receive notice of their right to appeal to the RAP at the time they receive the provisional decision from the ~~first~~First Panel.

Applicants may request an appeal to the RAP by submitting a written request to the Registration Committee within fifteen (15) days of the date they receive the ~~provisional~~initial registration decision.

The request must set out the basis for the appeal. The applicant must also submit an appeal fee ~~in for~~ the amount of \$~~141.25 (includes 150 + HST)~~ 150 + HST.

Scope of Appeal

The RAP process is a paper-based document review only; oral submissions will not be heard. The RAP will review the reasonableness of the provisional decision. The RAP will have full access to the applicant's registration file. Requests for an appeal that include new, relevant information, or

Registration Appeal Panel

Date Approved: May 14, 2012

Date Last Revised: N/A

documentation that was not before the ~~first Panel~~initial panel, will be referred back to the ~~first~~First Panel for reconsideration under paragraph ~~#2~~, below.

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Disposition

Possible Outcomes

The RAP may:

1. Dismiss the appeal, if they find the ~~provisional~~ decision of the ~~first Panel~~was initial registration panel reasonable. The provisional decision ~~and reasons~~ of the ~~first~~First Panel ~~at this point will then~~ become the final ~~order~~decision of the Committee;
2. Return the ~~provisional~~original decision to ~~first~~the First Panel for reconsideration. ~~Unless the following~~ reconsideration ~~resulted from new information of documentation submitted at by~~ the ~~RAP stage~~First Panel, the ~~decision of the first~~First Panel ~~after will issue a decision~~. Where the reconsideration ~~becomes decision included consideration by the final order of~~First Panel of new, relevant information or documentation that was not previously before it, the decision will be considered provisional and may be appealed to the RAP. Where the reconsideration decision did not include consideration of new, relevant information or documentation, the decision becomes a final order of the Registration Committee; ~~or,~~
3. Make an order ~~pursuant to s. as per section~~ 18 (2) or s. 19 (6) of the *Health Professions Procedural Code*. This becomes the final ~~order~~decision of the Registration Committee.

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After an application has been disposed of by the RAP and a final order of the Committee has been issued, an applicant may appeal the order to ~~HPARB~~Health Professions Appeal and Review Board in accordance with the provisions set out in the *Health Professions Procedural Code*.

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REGISTRATION POLICY

Registration Appeals Panel

The Registration Committee is composed of two panels. One panel (the First Panel) reviews and issues decisions, and the Registration Appeals Panel (RAP) hears appeals of eligible registration decisions.

Not all registration decisions are appealable to the RAP. Decisions are appealable if the First Panel makes an order under section 18(2) or 19(6) of the [Health Professions Procedural Code](#). All other decisions of the First Panel are not appealable and become final orders of the Registration Committee.

Composition

1. The RAP shall be composed of a minimum of 3 members with,
2. at least one Director of the Board who is a registrant of the College;
3. at least one Director of the Board appointed to the Board by the Lieutenant Governor in Council; and
4. if the Board so decides, up to three registrants of the College who are not a Director of the Board.

No member of the First Panel shall be a member of the RAP. Three members of the RAP constitute a quorum.

Process for Appeal

Applicants whose provisional decisions are eligible for appeal to the RAP will receive notice of their right to appeal to the RAP at the time they receive the provisional decision from the First Panel. Applicants may request an appeal to the RAP by submitting a written request to the Registration Committee within fifteen (15) days of the date they receive the initial registration decision. The request must set out the basis for the appeal. The applicant must also submit an appeal fee for the amount of \$150 + HST.

Scope of Appeal

The RAP process is a paper-based document review only; oral submissions will not be heard. The RAP will review the reasonableness of the provisional decision. The RAP will have full access to the applicant's registration file. Requests for an appeal that include new, relevant information, or documentation that was not before the initial panel, will be referred back to the First Panel for reconsideration under paragraph 2, below.

Possible Outcomes

The RAP may:

1. Dismiss the appeal, if they find the decision of the initial registration panel reasonable. The provisional decision of the First Panel will then become the final decision of the Committee;
2. Return the original decision to the First Panel for reconsideration. Following reconsideration by the First Panel, the First Panel will issue a decision. Where the reconsideration decision included consideration by the First Panel of new, relevant information or documentation that was not previously before it, the decision will be considered provisional and may be appealed to the RAP. Where the reconsideration decision did not include consideration of new, relevant information or documentation, the decision becomes a final order of the Registration Committee.
3. Make an order as per section 18 (2) or s. 19 (6) of the *Health Professions Procedural Code*. This becomes the final decision of the Registration Committee.

After an application has been disposed of by the RAP and a final order of the Committee has been issued, an applicant may appeal the order to Health Professions Appeal and Review Board in accordance with the provisions set out in the *Health Professions Procedural Code*.