

## One-Year Evaluation Report

### Temporary Class and Reinstatement Regulation Changes

#### Executive summary

The College of Nurses of Ontario (CNO) protects the public by promoting safe nursing practice. This includes registering nurses, whether educated in Canada or internationally, who have the knowledge, skill and judgment to practice safely in Ontario.

In late October 2022, CNO implemented new registration regulations with the goal of increasing the number of qualified nurses available to provide safe patient care in the province. The changes expanded eligibility for applicants seeking to register in the Temporary Class and facilitate the process for non-practising and former nurses to reinstate and return to practice.


As the regulator of nursing in Ontario, CNO has a mandate of public safety and it is important for CNO to understand the impact of the regulation changes. This one-year evaluation report assesses the impact of the regulatory changes on health human resources, patient safety, applicants, registrants and employers. CNO collected and reviewed health human resource data from CNO's enterprise information system. Surveys with eligible applicants, registrants and employers were also conducted. Overall, there was a positive impact on the intended outcome of increasing the number of nurses available to the Ontario health care system.

Between Nov. 1, 2022 - Nov. 1, 2023, 8,048 applicants became eligible for the Temporary Class because of the new registration regulations. While there was a notable 47% increase in applicants eligible for the Temporary Class, actual registrations showed a smaller uptick (a 31% increase relative to the previous year). Only 35% (n=1,988) of eligible Ontario applicants and 16% (n=348) of eligible internationally educated nurses (IENs) registered in the Temporary Class. A 34% increase in Temporary Class employment positions was also found, with hospitals and long-term care seeing the biggest gains.

Despite increased eligibility, many eligible applicants continued to directly register in the General Class (51% of Ontario applicants, 59% of IENs), contributing to the lower-than-expected number of Temporary Class registrations.

Surveys conducted indicated a high level of awareness regarding the regulation changes. Most eligible applicants (65%) and registrants (78%) acknowledged that the changes made them more likely to apply to the Temporary Class, while fewer employers (42%) expressed a likelihood to hire Temporary Class nurses as a result of the changes.

The extension of time allowed in the Temporary Class was also a significant factor influencing decisions to apply for both eligible applicants and registrants. However, finding an offer of employment for the Temporary Class was reported to be difficult. Employers also reported that the extension of time in the Temporary Class made an impact on their decision to hire but shared that the supervision requirements were a challenge.



There was a small increase (13%) in reinstatements year-over-year, with 12% reinstating their certificate of registration under the regulation that gives the Executive Director discretion on the amount of time a nurse (who previously worked in the province) can be out of practice.

CNO will continue to assess the impact of the regulation changes with a focus on patient safety as more data becomes available.

## Background and purpose

In response to a letter of direction from the Ministry of Health<sup>1</sup> to create new initiatives to expedite registration for IENs, CNO introduced regulation changes to the Temporary Class registration requirements. CNO also modified reinstatement requirements to make it easier for nurses in the Non-Practising Class and former registrants to reinstate and return to practice. These changes received government approval on Oct. 27, 2022.

The purpose of the regulation changes was to reduce registration barriers for IENs, increase the number of qualified nurses to provide safe patient care, and support the health human resource needs in Ontario.

### TEMPORARY CLASS

The Temporary Class regulation changes amended the eligibility requirements related to equivalent education and the registration exam. Applicants are eligible to register in the Temporary Class if they have:

- a) completed a nursing program that was, at the time it was completed, approved or recognized in the jurisdiction it was taken; and/or
- b) not failed the registration exam twice<sup>2</sup>.

Applicants must continue to meet the remainder of the General Class requirements to be eligible for Temporary Class registration<sup>3</sup> and have an offer of employment from an approved facility in Ontario. The regulation also gives the Executive Director discretion to extend the expiry date of a Temporary certificate of registration on no more than two occasions (previously six months and now up to 36 months if extensions are granted). Registrants in the Temporary Class must also follow specific terms, conditions, and limitations to ensure public safety.

Allowing IENs to enter the Temporary Class without meeting the education requirement (but still having approved or recognized nursing education from their home jurisdiction) enables them to gain practice experience while continuing to work towards meeting the education and examination requirements for registration in the General Class.

### REINSTATEMENT

The regulation changes to the reinstatement process make it simpler for former registrants and those in the Non-Practising Class to reinstate<sup>4</sup> and return to practice. The Executive Director now has the discretion to extend the evidence of practice requirement beyond three years if registrants or former registrants can demonstrate that they are safe and competent to practice.

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<sup>1</sup> [Direction from Ministry of Health](#)

<sup>2</sup> Previously, applicants were ineligible if they had ever failed the registration exam or if they did not meet the General Class education requirement, wherein applicants must successfully complete a nursing education program approved by CNO or demonstrate equivalency.

<sup>3</sup> [Requirements for Temporary Class registration](#)

<sup>4</sup> [Requirements for reinstatement](#)

As the regulator of nursing in Ontario with a mandate of public safety, it is important for CNO to understand the impact of the regulation changes. Therefore, an evaluation was conducted to examine outcomes across several domains.

## Methodology

In early 2023, an evaluation framework was developed and shared with system stakeholders for input. The evaluation focused on four domains:

- Health human resources
- Patient safety
- Applicants and registrants, and
- Employers

Evaluation questions were categorized according to the timing of data collection and reporting:

Evaluation questions	Domain	Timing
<i>Immediate</i>	Registrants	3 months after changes
<i>Intermediate</i>	Eligible applicants and employers	8 months after changes
<i>Long-term</i>	Patient safety and health human resources	1 year after changes or once sufficient data has accrued

Data collection methods involved gathering health human resource data from CNO’s enterprise information system. Surveys were also conducted with eligible applicants, registrants and employers using a mix of multiple choice and open-ended questions.

In February and May 2023, Temporary Class registrants and nurses who reinstated were surveyed. A total sample of 1,224 participants were contacted with 28% responding to the survey. In August 2023, both employers of Temporary Class nurses and eligible applicants were surveyed separately. The response rate for the employer survey was 19% (total contacted sample=369) and the response rate for the eligible applicant survey was 13% (total contacted sample=692).

The *Immediate* and *Intermediate* evaluation questions form the basis of the current one-year evaluation report. The health human resource data reported below covers the period from Nov. 1, 2022, to Nov. 1, 2023. To reflect the number of potential new nurses to the system, the data only includes applicants who were not registered with CNO at the time they became eligible to register in the Temporary Class. For instance, applicants already registered in the General Class as a Registered Practical Nurse (RPN) when becoming eligible for registration in the Temporary Class as a Registered Nurse (RN) are excluded.

## Temporary Class: Health human resource data

### ELIGIBILITY

Table 1 shows how many applicants became eligible for registration in the Temporary Class between Nov. 1, 2022 and Nov. 1, 2023, broken down by their type of application to the General

Class<sup>5</sup>. A total of 8,048 applicants were eligible for registration in the Temporary Class with the majority being Ontario applicants (71%); 27% were internationally educated applicants.

Table 1	Application Type <sup>5</sup>			
	Ontario	Canadian	International	Total
<b>Eligible for Temporary Class</b>	5,741	102	2,205	<b>8,048</b>

To determine the impact of the regulation changes on the number of applicants eligible for the Temporary Class, the number of applicants who would not have otherwise been eligible before the regulation changes was determined (Table 2). After the regulation changes came into effect, there was a 47% increase in eligible applicants – with many of these being IENs whose education was assessed as not equivalent (see Table 2).

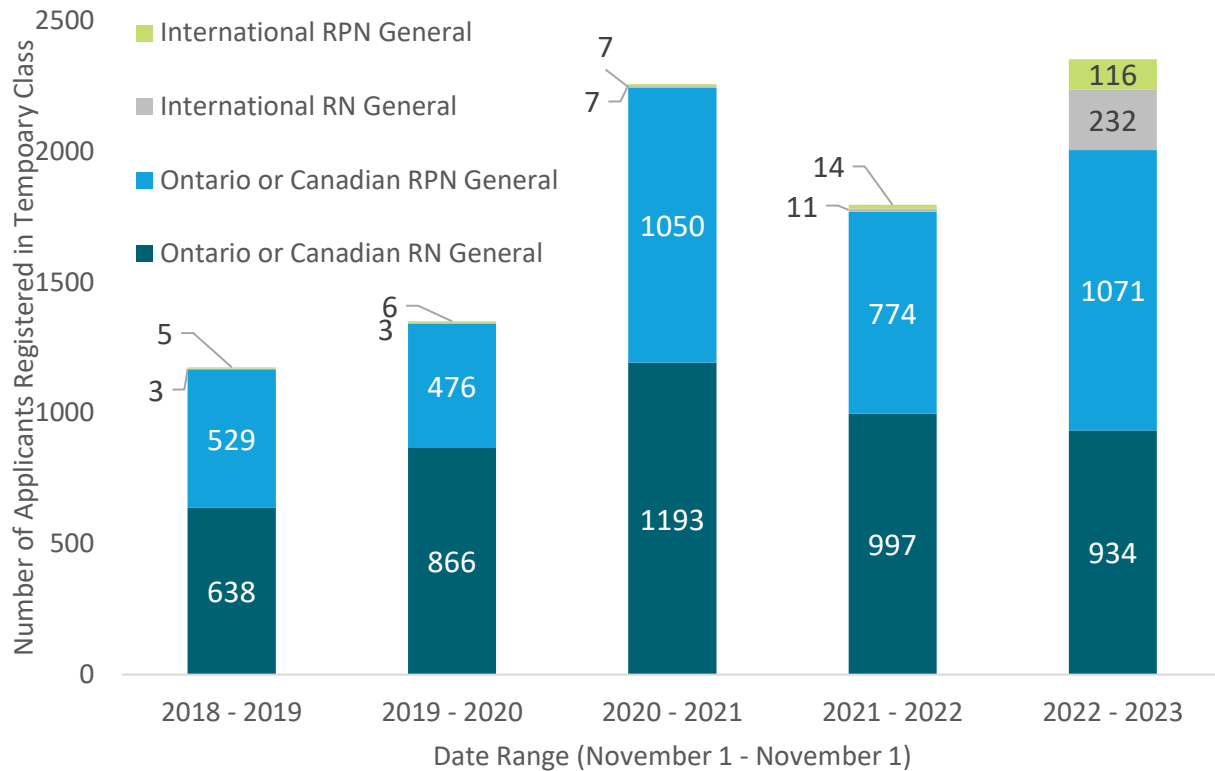
Table 2	Reason for Prior Ineligibility		
	Education Not Equivalent	One or More Exam Failure	Total
<b>Ineligible for Temporary Class Prior to Regulation Changes</b>	1,438* (56%)	1,128 (44%)	<b>2,566</b>

\* Forty-six applicants were ineligible due to both education not being equivalent and having one or more exam failure. They are included in the education not equivalent category.

## REGISTRATION IN TEMPORARY CLASS

Figure 1 shows the number of applicants who have registered in the Temporary Class, grouped into the General Class nursing category they are applying to (RN, RPN) and application type<sup>5</sup> over the past five years. The number of Temporary Class nurses registered over the past year (2022-2023) is the highest relative to the previous four years (n=2,353, an increase of 31% year-over-year). The increase is a result of more IEN applicants becoming registered in the Temporary Class. In 2022-2023, there were eight times as many internationally educated RPNs and 21 times as many internationally educated RNs registered in the Temporary Class as compared to the previous year.

<sup>5</sup> Application type to the General Class is based on the location of nursing education – Ontario, Canadian or international.



**Figure 1.** The number of applicants registered in the Temporary Class grouped into the General Class nursing category for which they are applying and application type over the past five years.

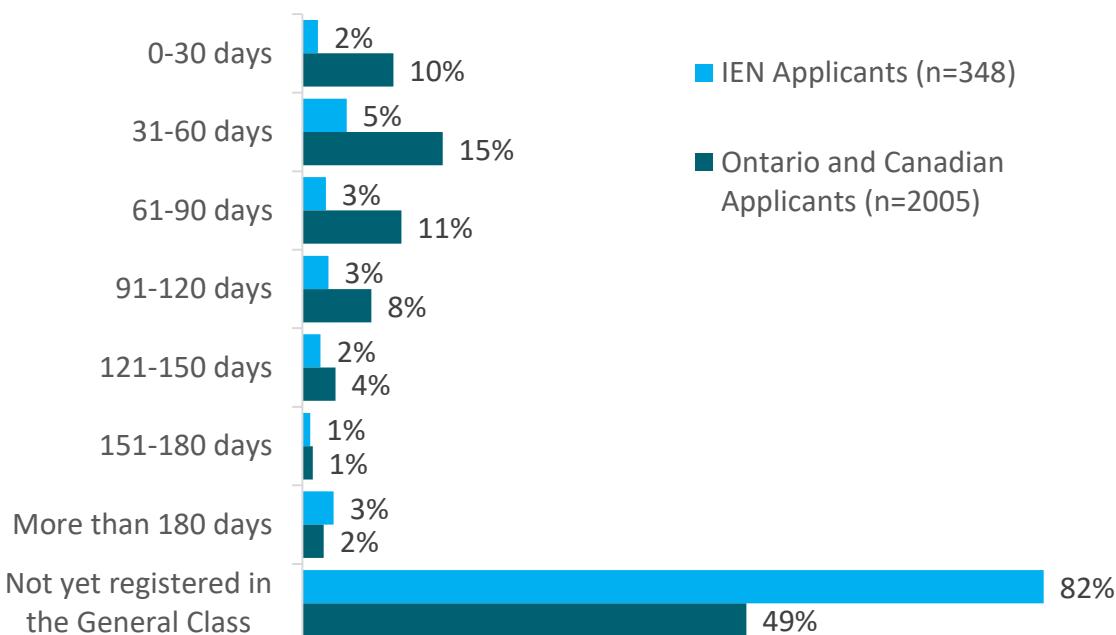
Of those who were eligible to register in the Temporary Class in the past year, 35% of Ontario applicants registered, whereas only 16% of IENs registered. Part of the reason for the low uptick is that a large proportion (51% of Ontario applicants and 59% of IENs) directly registered in the General Class without registering in the Temporary Class. Further information on registration in the General Class is presented below.

### REGISTRATION IN THE GENERAL CLASS

Of the nurses who registered in the Temporary Class since Nov. 1, 2022, just under half (1,089; 46%) became registered in the General Class by Nov. 1, 2023. While 51% of Ontario applicants who were registered in the Temporary Class had registered in the General Class during the timeframe of the report, only 18% of international Temporary Class registrants had registered in the General Class. This is largely related to the fact that IENs still need to meet the nursing education requirement for registration which extends the registration period relative to Ontario applicants.

## LENGTH OF TIME TO GENERAL CLASS REGISTRATION

Figure 2 shows the length of time in days from becoming registered in the Temporary Class to becoming registered in the General Class. As expected, many Temporary Class registrants from Ontario or Canada became registered in the General Class within four months (44%), whereas internationally educated Temporary Class registrants took longer to register in the General Class – only 13% registered within four months and most had not yet registered (82%).



**Figure 2.** The length of time in days from becoming registered in the Temporary Class to becoming registered in the General Class.

## TEMPORARY CLASS EMPLOYMENT POSITIONS BY REGION

A total of 2,455 Temporary Class employment positions were reported from Nov. 1, 2022 to Nov. 1, 2023. This number is greater than the number of registrants because some Temporary Class registrants had more than one employer. A total of 1,826 Temporary Class positions were reported in 2021-2022. Year-over-year, this represents 629 additional Temporary Class positions reported (an increase of 34%). The increase is driven in large part by an increase in employment positions reported by Temporary Class IENs (going from 27 reported in 2021-2022 to 382 in 2022-2023). When looking at the geographic region where nurses were employed in the Temporary Class, there were no major differences in the proportion of employment positions across regions year-over-year.

## TEMPORARY CLASS EMPLOYMENT POSITIONS BY SETTING

Table 3 shows the practice settings where nurses were employed in the Temporary Class from Nov. 1, 2022 to Nov. 1, 2023. The majority (73%) of Temporary Class employment positions were within a hospital setting. When looking at the changes in Temporary Class employment positions by setting year-over-year, hospital and long-term care settings both gained a similar number of positions (316 and 325, respectively). However, Temporary Class positions in long-

term care increased by 131% year-over-year, whereas hospital positions only increased by 22% suggesting that long-term care settings benefited the most from the additional Temporary Class nurses available to the system. Employment positions of IENs in the Temporary Class accounted for the large increase in long-term care, with 197 of the 325 new positions (61%) in long-term care reported by IENs.

**Table 3**

<b>Practice Setting</b>	<b>Number of Employment Positions (%)</b>
Primary Care	39 (2%)
Hospital	1,781 (73%)
Long-Term Care	574 (23%)
Other	61 (2%)
<b>Total</b>	<b>2,455</b>

### **EXPIRY OF TEMPORARY CLASS REGISTRATION**

Within the group that registered in the Temporary Class between Nov. 1, 2022 and Nov. 1, 2023 (n=2,353), the overall rate of expiry due to exam failure was low. Only 28 Temporary Class registrants (1%) had their registration expire due to failing the registration exam more than once.

### **SUMMARY**

Despite a large increase in eligibility, the increase in Temporary Class registration was lower than expected. However, there was still an increase observed over historical data. More Ontario applicants registered in the Temporary Class than IENs. Ontario applicants also became registered in the General Class more quickly relative to IENs. Lastly, there was an increase in the number of Temporary Class employment positions with the additional positions being reported in hospitals and long-term care.

## **Temporary Class: Applicant and registrant survey data**

### **ELIGIBLE APPLICANT SURVEY - TEMPORARY CLASS**

In August 2023, CNO surveyed applicants who became eligible for the Temporary Class after the regulation changes took effect. This survey targeted those who had not registered in either the Temporary Class or General Class at the time the sample was extracted, with the goal of enhancing understanding of their experience (n=692). Eighty-seven applicants responded (a 13% response rate).

Applicants eligible for Temporary Class registration are notified by CNO of their eligibility through an email. In the survey, 91% indicated they were aware of their eligibility.

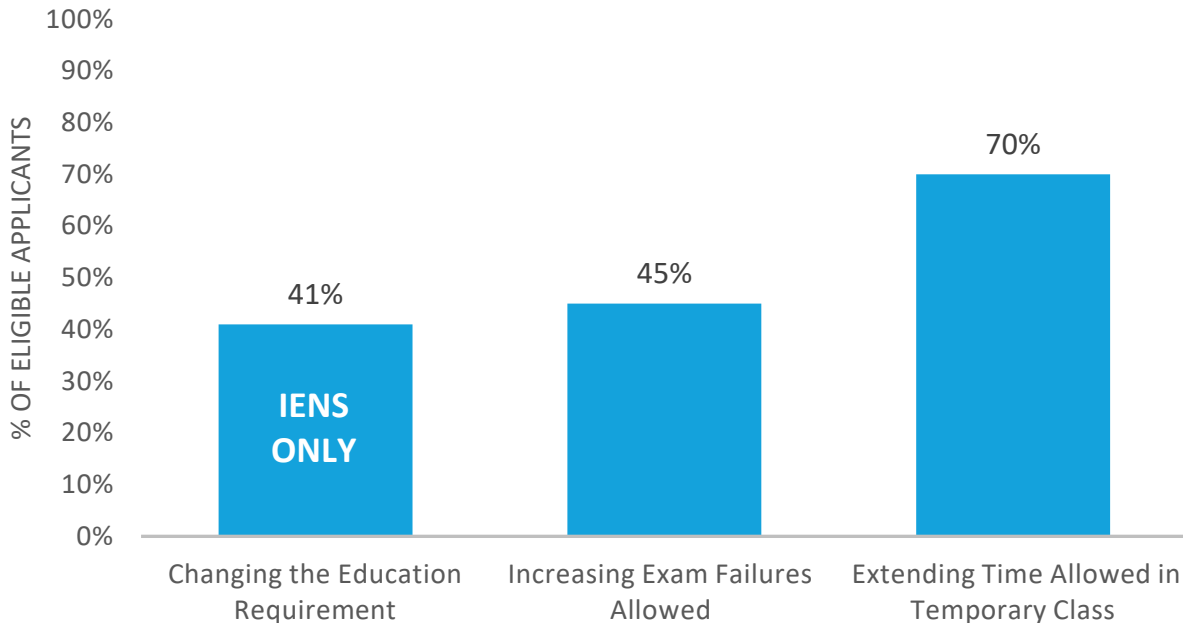
Of the group who were aware:

- 13% were already registered in the Temporary Class,
- 24% had an open Temporary Class application,

- 40% were planning to apply to the Temporary Class, and
- 23% were not planning to apply.

Of those not planning to apply, the main reasons were wanting to focus on meeting the General Class registration requirements (44%) and not being able to find an offer of employment (39%).

Of those with an open application or intending to apply, 61% were aware of the regulation changes and 65% said they were more likely to apply to the Temporary Class as a result. Extending the time allowed in the Temporary Class was the regulation change that most eligible applicants mentioned as having an impact on their decision to apply (70%, Figure 3).



**Figure 3.** The impact the regulation changes on the decision to apply to the Temporary Class for eligible applicants who were more likely to apply.

Eligible applicants with an open application or planning to apply also mentioned that finding an offer of employment at an approved facility was the main barrier faced when applying or becoming registered in the Temporary Class (82%). The main challenges with finding employment from the perspective of eligible applicants were:

- Employers not wanting to hire Temporary Class nurses (53%)
- Employers not having the capacity to hire Temporary Class nurses due to the supervision requirement or the terms, conditions and limitations involved (51%)
- Employers not being aware of the Temporary Class (49%)

### REGISTRANT SURVEY – TEMPORARY CLASS

A survey of nurses who successfully registered in the Temporary Class after the regulation changes took effect was also conducted. A total sample of 826 Temporary Class nurses were contacted and 246 responded to the survey (142 RNs, 104 RPNs). All nurses who participated in the survey were planning to transfer to the General Class after meeting the remaining requirements.

When asked why they decided to apply to the Temporary Class, respondents provided various reasons:

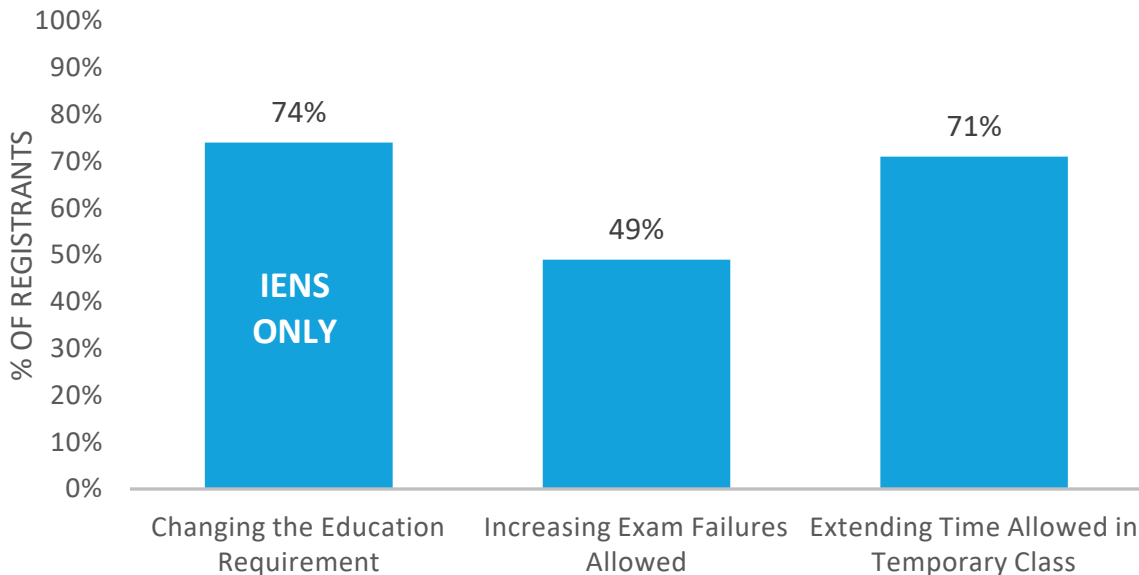
- To gain work experience





- To get to work sooner
- The opportunity was available to them
- To gain more time to study for the registration exam
- To help support their community and colleagues in a difficult time
- Financial reasons
- To ensure their recent practice did not expire while they met other General Class requirements

Most of the Temporary Class registrants were aware of the regulation changes (85%). Among those who had not applied before the changes, 65% had not considered applying to the Temporary Class. Additionally, 78% mentioned that the changes increased their likelihood of applying. Similar to the eligible applicants, extending the time allowed in the Temporary Class was a regulation change that many registrants mentioned as affecting their decision to apply (71%, Figure 4). IENs also mentioned the change to the education requirement influenced their decision (74%).



**Figure 4.** The impact of the regulation changes on the decision to apply to the Temporary Class for registrants who were more likely to apply.

Only 14% reported having difficulty finding an employer – a much lower number compared to eligible applicants. However, being registered in the Temporary Class is conditional on having an offer of employment. Therefore, the low reported difficulty only reflects the views of those who successfully found an offer of employment and likely underestimates the challenges Temporary Class applicants had trying to meet the requirement. Despite the lower reported difficulty with finding an employer among registrants, challenges similar to those described by eligible applicants were raised in the open-ended survey responses, such as employers not wanting to hire Temporary Class nurses and employers not being aware of the Temporary Class.

## SUMMARY

Most eligible applicants and registrants were aware of the regulation changes and said that they were more likely to apply to the Temporary Class because of the changes. The extension of the

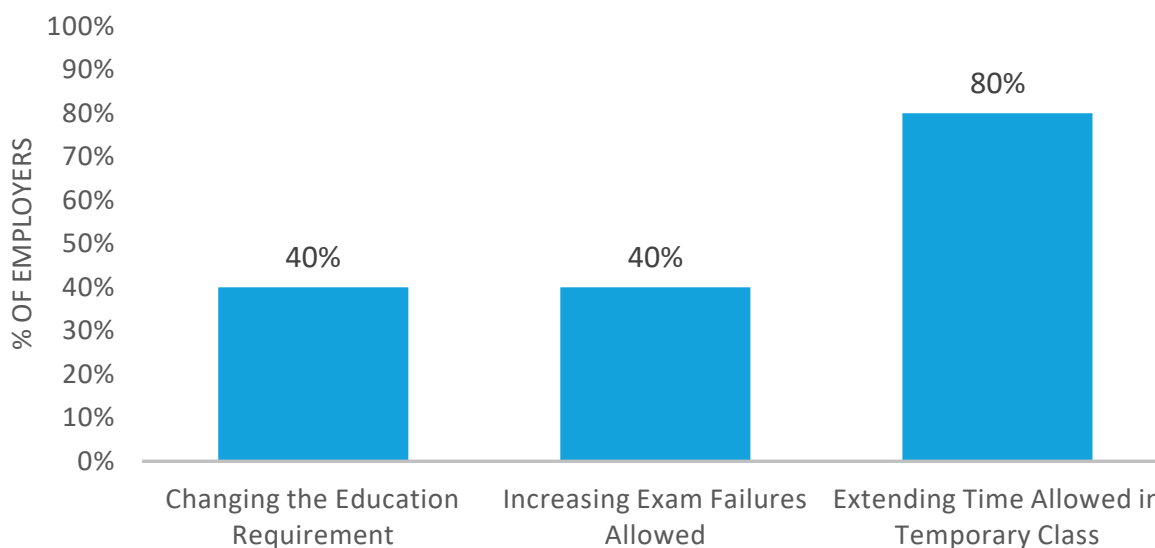
time allowed in the Temporary Class was mentioned as one of the main changes impacting the decision to apply for both groups. Eligible applicants indicated that finding an employer was a key challenge related to applying and becoming registered in the Temporary Class, whereas most registrants reported no difficulty with finding an employer.

## Temporary Class: Employer data

### EMPLOYER SURVEY - TEMPORARY CLASS

Organizations that employed a Temporary Class nurse who registered after the regulation changes took effect were also surveyed (n=369). A total of 71 employers of Temporary Class nurses responded to the survey. Of these, 66% were long-term care or retirement homes, 25% were hospitals and 9% were classified as other types of employment settings (for example, home and community care services, addiction and mental health centres).


The majority of surveyed employers (85%) said they were aware of the Temporary Class regulation changes. Only 42% indicated that the regulation changes made their organization more likely to hire Temporary Class nurses; many reported no impact of the changes on the decision to hire (47%). Mirroring the findings from the eligible applicants and Temporary Class registrants, extending the time allowed in the Temporary Class was the regulation change that most employers pointed to as having a positive impact on their decision to hire (80%, Figure 5). It is important to keep in mind the sample of employers surveyed represents those who hired a Temporary Class nurse. Employers who chose not to hire Temporary Class nurses or who lacked capacity were not contacted and may have different perspectives.



**Figure 5.** The impact of the regulation changes on the decision to hire Temporary Class nurses for employers that were more likely to hire.

The most common reason for hiring Temporary Class nurses was to support the organization's current staffing needs (93%) and 57% of the surveyed employers indicated they had hired an IEN in the Temporary Class. Most employers (87%) felt the terms, conditions, and limitations on the Temporary Class supported safe practice.

The main challenges faced by employers when hiring Temporary Class nurses included the:

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- Need for Temporary Class nurses to be supervised by a nurse registered in the General or Extended Class and the impact on the supervising nurses' ability to practice (62%)
  - Terms, conditions, and limitations on the Temporary Class certificate. For example, not being able to supervise, monitor or direct the performance of a controlled or authorized act or the practice of another nurse (45%)
  - Time commitment for supervising Temporary Class nurses up to 24 months (25%)

Many employers reported no challenges when employing Temporary Class nurses (30%). This pattern differed slightly when looking across employer settings. More long-term care employers mentioned the supervision requirements related to the Temporary Class as a challenge (72%) relative to hospitals (50%). This would be expected as hospitals are typically larger organizations and are more likely to have increased capacity for supervision. Again, it is important to consider that the challenges experienced by employers who hired Temporary Class nurses may not be reflective or generalizable to employers who were not surveyed (who did not hire Temporary Class nurses).

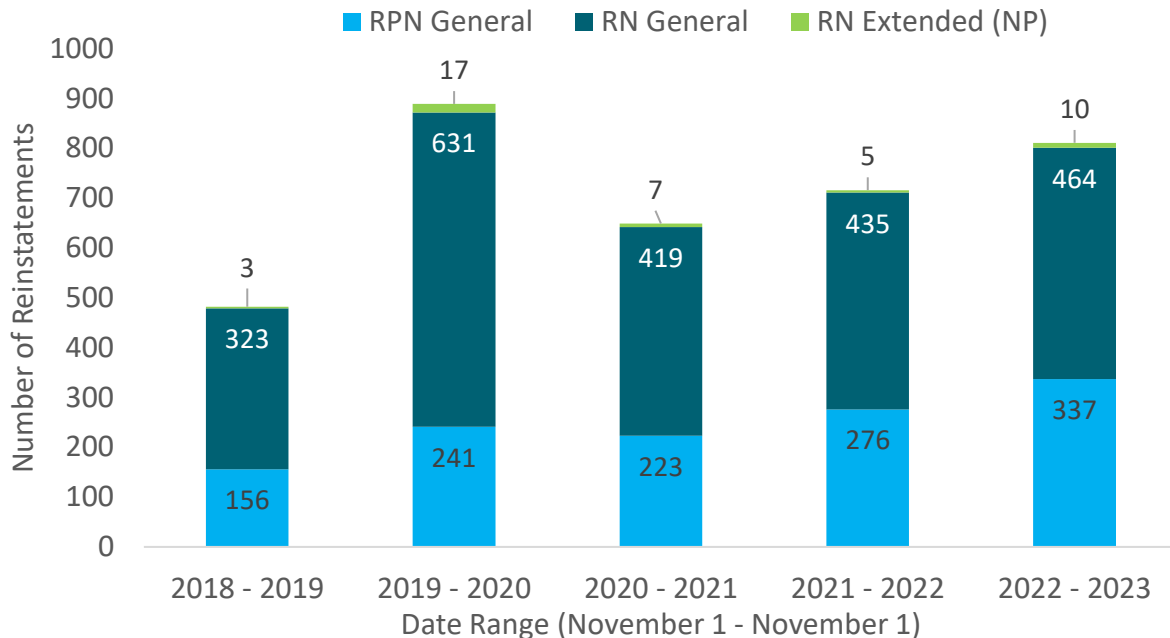
## **SUMMARY**

Most Temporary Class employers surveyed were aware of the regulation changes and felt that the extended time allowed in the Temporary Class was a change that impacted their decision to hire. Some reported concerns with hiring Temporary Class nurses because of the supervision requirements, but others noted no challenges. The findings from the employer group need to be interpreted with care keeping in mind that the majority of responding employers were from long-term-care settings and represent those that successfully hired a Temporary Class nurse.

## **Reinstatements: Health human resource data**

### **REGISTRATION**

Figure 6 shows the number of nurses who reinstated their General or Extended Class registration over the past five years. To reflect the number of new nurses added to the system, these data show nurses without any other CNO registration at the time of reinstatement. The total number of nurses reinstating in 2022-2023 was the second highest (n=811) within with the past five years; second only to 2019-2020 when many nurses reinstated during the initial wave of the COVID-19 pandemic. Much of the increase in the past year comes from nurses reinstating in the RPN General Class.



**Figure 6.** The number of nurses who reinstated their General or Extended Class registration over the past five years.

### PREVIOUS NURSING CLASS

Reinstatement can occur one of three ways:

1. Following a certificate of registration being expired or resigned
2. When a nurse from the Non-Practising Class wants to reinstate their certificate of registration in the General or Extended Class
3. When a current General Class nurse who has left the Extended Class wants to reinstate their certificate of registration to return to the Extended Class


Since the regulation changes came into effect, 478 (59%) nurses who chose to return to practice have reinstated from the Non-Practising Class, while 333 (41%) have reinstated from an expired or from a resigned certificate of registration.

### EXECUTIVE DIRECTOR DISCRETION

Prior to the regulation changes, a nurse needed to demonstrate evidence of practice within the previous three years to reinstate. The regulatory changes now allow the Executive Director the discretion to extend the evidence of practice requirement beyond the three-year period. The Executive Director must be satisfied that the registrant or former registrant is safe and competent to practice nursing. Of the 811 nurses that have reinstated since Nov. 1, 2022, 95 (12%) were reinstated through the Executive Director's discretion.

### REINSTATEMENT SURVEY

Nurses who reinstated after the regulation changes went into effect were contacted to complete a survey of their experience. A total of 92 reinstated nurses responded to the survey (62 RNs, 30 RPNs). Most respondents were out of practice for three years or less (59%), while 22% were out of practice for three to five years. Only 19% were out of practice for five or more years. When asked about how long they intended to stay in practice, 63% intended to stay for more than two years. Most reinstatements had found employment (63%).



Respondents provided various reasons when asked why they decided to reinstate:

- To assist with the current crisis
- Asked to reinstate by an employer
- Wanted to and/or felt called to the profession
- Returning from scheduled time away from practicing related to raising children
- Relocating from out of province
- Financial reasons

Fewer reinstating nurses (only 41%) were aware of the regulation changes compared to the Temporary Class groups surveyed. For those who had not applied at the time of the regulation changes, 46% did not consider reinstating before the changes. When determining if the changes made them more likely to apply, only the group that was out of practice for three or more years was included (the regulation change for reinstatements was applicable only to this group). Within that group, 77% said that the regulation changes made them more likely to apply for reinstatement.

## SUMMARY

There was a small increase in the number of reinstatements year-over-year and a small proportion of reinstatements used the Executive Director discretion to meet the evidence of practice requirement. Few reinstatements were aware of the regulation changes, but those that were aware and had been out of practice for more than three years said that they were more likely to apply for reinstatement because of the changes.


## Conclusion

Overall, the regulation changes had the intended effect of increasing the number of nurses available to the Ontario health care system. After the regulation changes were implemented, there were 47% more applicants eligible for the Temporary Class. While the number of Temporary Class registrations was the highest seen in the past five years, the uptick in registration was low with only 35% of eligible Ontario applicants and 16% of eligible IENs registering in Temporary Class. There was an increase in the number of Temporary Class employment positions year-over-year (+34%) with the additional positions being reported in hospitals and long-term care.

Regarding the impact of the regulatory changes on the Temporary Class, there was a positive impact on eligibility, but this did not translate into Temporary Class registrations at the same rate. Several factors may be involved:

- Most eligible applicants and registrants were aware of the regulation changes, but many bypassed the Temporary Class altogether and registered directly in General Class (51% of Ontario applicants and 59% of IENs)
- Finding an offer of employment for the Temporary Class was reported to be difficult by eligible applicants due to lack of employer awareness, capacity or lack of desire to hire Temporary Class nurses
- From an employer standpoint, the requirement to supervise Temporary Class nurses may reduce the benefits of having an extra nurse available in the workplace

There was also a small increase in the number of reinstatements observed year-over-year. Of those that reinstated since the regulation changes, a small number (12%) made use of the Executive Director's discretion to reinstate, as their evidence of practice was beyond three years.



Concerning the impact of the regulation change for reinstatements, the increase observed was quite small year-over-year. Again, several factors are likely to be involved:

- The regulation change for reinstatements made Executive Director discretion available to those who have been out of practice for more than three years. Since this change only applies to a subset of retired and non-practising nurses (and not to the full group who could potentially reinstate), a smaller impact on the number of reinstatements would be expected
- The awareness of the regulation changes related to reinstatement was low among surveyed reinstatements
- There are other significant factors involved when making the decision to reinstate like work environment or pay

## Next Steps

CNO will continue to evaluate the regulation changes as new data become available for the *Immediate* and *Intermediate* evaluation questions presented above along with evaluating new data on the *Long-Term* evaluation questions related to impacts on patient safety. In addition, CNO will regularly revisit policies that support implementing the regulation changes to assess whether adjustments are needed (e.g., amount of time someone will be granted a Temporary certificate of registration).