

ORMI Q3 2026 Intelligence Brief

What Ontario Regulatory Boards Are Prioritizing

Upstream Management Solutions

September 30, 2026

Executive Summary

The **Ontario Regulatory Modernization Index (ORMI)** provides an evidence-based view of the issues, initiatives, and priorities receiving attention from Ontario professional regulatory Boards and Councils through their publicly available governance materials.

The Q3 2026 ORMI review analyzed 107 significant items from 25 Board/Council meetings involving 23 Ontario health and non-health regulators. All qualifying Q3 meetings reviewed occurred in September.

The Q3 review identified five key findings:

1. **Modernization is expanding into the regulatory core.** Modernization extended beyond organizational processes into regulatory models, policy frameworks, professional regulation and approaches to delivering public protection.
2. **Risk-based regulation is becoming operational across regulatory functions.** Risk-based approaches appeared in quality assurance, standards development, governance, interprofessional practice, practice assessment, and regulatory-model design.
3. **Practice frameworks are adapting to changing practice and expanded scopes.** Regulators brought forward changes involving professional obligations, standards, competencies, credentialing, expanded scopes of practice, and associated implementation requirements.
4. **Digital capability and AI are developing along two regulatory tracks.** Q3 materials show both organizational applications—such as AI governance, cybersecurity, data infrastructure, and digital systems—and regulatory responses to the use of AI and emerging technologies in professional practice.
5. **Performance and risk systems are evolving toward regulatory intelligence and adaptive decision-making.** Several regulators brought forward dashboards, risk registers, environmental-scanning processes, outcome measures, and other approaches intended to strengthen the information available for governance and regulatory decision-making.

What the Q3 Profile May Mean

Compared with Q2, the Q3 materials contained a greater relative concentration of significant items involving digital and technology, standards and competence, and regulatory policy and legislative reform. Governance and oversight represented a substantially smaller share of the Q3 items analyzed.

These differences describe the mix of publicly visible matters reaching Boards and Councils during each quarter. They do not establish that regulators intentionally changed their organizational priorities; quarterly agendas may reflect work cycles, implementation schedules, legislative or government requirements, emerging issues, strategic choices or other demands.

Four patterns warrant continued observation:

- risk-based approaches are appearing across multiple regulatory functions;
- practice change is creating interconnected requirements for standards, competencies, credentialing and quality assurance;
- AI and digital change is developing as both an organizational-governance and professional-practice issue; and
- some regulators are connecting performance, risk and environmental information more directly with decision-making.

Key Q3 Conclusion

The Q3 evidence shows modernization reaching the design and delivery of regulation itself—including risk-based approaches, practice frameworks, changing scopes, digital and AI issues, and performance intelligence. Subsequent ORMI reviews will help determine which Q2–Q3 differences persist and which reflect quarter-specific demands.

WHAT ORMI MEASURES

ORMI analyzes publicly available Board/Council agendas, meeting materials and minutes. It therefore captures matters that have progressed sufficiently to reach public governance attention—not the full pipeline of work that may still be under research, development or internal consideration.

An item appearing in Board/Council materials should not be interpreted as approved or implemented unless a subsequently published public record confirms the outcome. Standalone Annual Reports, Strategic Plans and other organizational publications are not independently scored unless the relevant matter is presented through a Board/Council meeting.

Q3 2026 Regulatory Modernization Landscape

Table of Contents

Executive Summary.....	1
Q3 2026 Regulatory Modernization Landscape.....	3
Introduction	3
Finding 1 — Modernization is Expanding into the Regulatory Core.....	4
Finding 2 — Risk-Based Regulation is Becoming Operational Across Regulatory Functions	5
Finding 3 — Practice Frameworks Are Adapting to Changing Practice and Expanded Scopes	7
Finding 4 — Digital Capability and AI Are Developing Along Two Regulatory Tracks	9
Finding 5 — Performance and Risk Systems Are Evolving Toward Regulatory Intelligence and Adaptive Decision-Making.....	10
Q2–Q3 Board Attention Profile	12
What We’re Watching	14
Questions for Regulatory Leaders	15
Implications and Conclusion	15
Appendix A — ORMI Methodology and Interpretation	17
Appendix B — Q3 Board Attention Profile and Q2–Q3 Category Crosswalk	19
Appendix C — Q3 2026 Coverage	21

Introduction

The Q3 2026 Ontario Regulatory Modernization Index (ORMI) provides an evidence-based view of the significant issues, initiatives and priorities receiving attention from Ontario professional regulatory Boards and Councils through their publicly available governance materials.

The Q3 review analyzed 107 significant items from 25 Board/Council meetings involving 23 Ontario health and non-health regulators, all in September.

The quarter's publicly visible activity extended across the regulatory system—from standards, competence and entry-to-practice requirements to regulatory policy, risk-based approaches, digital transformation, artificial intelligence, governance, performance and organizational capability.

Five findings emerged from the Q3 analysis:

1. **Modernization activity is expanding into the regulatory core.**
2. **Risk-based regulation is becoming operational across regulatory functions.**
3. **Practice frameworks are adapting to changing practice and expanded scopes.**
4. **Digital capability and AI are developing along two regulatory tracks.**
5. **Performance and risk systems are evolving toward regulatory intelligence and adaptive decision-making.**

Together, the findings provide a picture of the **modernization activity reaching public Board and Council attention during Q3**. They should not be interpreted as a complete inventory of regulatory change underway across the sector. Some initiatives may still be under research or development and have not yet reached a public governance agenda, while matters presented to a Board or Council should not be assumed to have been approved or implemented unless the subsequent public record confirms the outcome.

How to Read the Findings

Each finding identifies a pattern observed across the Q3 materials and is supported by examples from individual regulators. ORMI Insights provide interpretation. Featured Developments and Also Observed examples are selected from matters presented to Boards or Councils for discussion, decision, or approval. Inclusion does not establish that a proposal was approved or implemented.

Finding 1 — Modernization is Expanding into the Regulatory Core

Modernization activity visible in Q3 extends beyond changes to governance processes and organizational systems into the **design and delivery of regulation itself**.

Across the quarter, Boards and Councils considered initiatives involving regulatory models, legislation and policy frameworks, professional conduct processes, registration requirements, and new approaches to regulatory delivery. Taken together, these developments show modernization activity touching functions that directly shape **how regulators regulate**, rather than modernization being confined to the supporting machinery of the organization.

ORMI Insight

The significance of this pattern is its breadth. Modernization is visible not simply in how regulatory organizations operate, but in the mechanisms through which they carry out their public-interest mandate.

Q3 materials included work on regulatory-model design, legislative modernization, professional-conduct processes, registration and governance arrangements, and experimentation with

alternative approaches to regulation. These initiatives differ considerably in scope and stage of development, but each involves reconsidering an element of the regulatory architecture itself. This does not mean that Ontario regulators are collectively pursuing a single model of modernization. Rather, Q3 provides multiple examples of regulators examining or changing core regulatory mechanisms in response to their particular mandates, environments and requirements.

Featured Development — CPO Health Professions Discipline Tribunal Pilot

The College of Physiotherapists of Ontario (CPO) Board was asked to decide whether to continue its participation in the Health Professions Discipline Tribunal (HPDT) on a longer-term basis, extend the pilot for another year, or return management of discipline hearings to the College.

The pilot involves a shared tribunal model with experienced adjudicators and hearing administration across participating health regulators. The Board materials evaluate its performance, independence, expertise, costs, capacity and sector collaboration after the College's first year of participation.

This is a concrete decision about the delivery of a core regulatory process. The material does not establish which option the Board chose; its significance for ORMI is that an alternative discipline model was evaluated at the governance level. (<https://collegept.org/wp-content/uploads/2026/09/September-28-29-2026-Board-Meeting-Package.pdf>, pp.227-239)

Also Observed in Q3

College of Psychology and Behaviour Analysis of Ontario (CPBAO) — proposed By-law 25 reporting requirements for supervisee identities and practice locations in non-institutional settings, to strengthen oversight and accountability for supervised services. The proposal did not call for making supervisee information public. (<https://cpbao.ca/wp-content/uploads/Materials-Board-Meeting-09-25-26.pdf>, pp.116-141)

ORMI Takeaway

Q3 shows modernization activity expanding into the mechanisms through which regulation is designed and delivered. Legislative frameworks, regulatory models, registration, professional conduct and alternative delivery approaches all appeared in publicly visible Board/Council work. The individual initiatives differ, but collectively they demonstrate that modernization activity is reaching the regulatory core—not only the organizational systems that support it.

Finding 2 — Risk-Based Regulation is Becoming Operational Across Regulatory Functions

Risk-based regulation is visible across a notably broad range of Q3 regulatory activity. Rather than appearing only as a general regulatory principle or enterprise risk-management concept, Q3

materials show regulators applying risk-based approaches to **quality assurance, professional standards, practice assessment, interprofessional practice, governance and regulatory-model design**.

The individual approaches differ, but they share a common feature: regulatory attention, requirements or resources are being differentiated according to the **nature or level of risk**, rather than applied uniformly.

ORMI Insight

The Q3 evidence suggests that risk-based regulation is being translated into specific regulatory mechanisms and decision processes. Examples include using risk indicators to determine who receives additional quality-assurance attention; assessing risk of harm when determining the appropriate level of prescription in professional standards; applying risk considerations to practice-assessment selection; and designing regulatory controls around activities that may present different levels or types of risk.

This is significant because it makes risk more than an organizational reporting concept. In these examples, risk becomes an input into how regulation itself is designed or applied. The approaches are not identical, nor does their appearance in Q3 establish a common sector-wide model. They do, however, provide multiple examples of risk-based thinking being applied to different regulatory functions.

Featured Development — CMRITO Risk-Based Cross-Specialty Practice Model

The **College of Medical Radiation and Imaging Technologists of Ontario (CMRITO)** presented a proposed regulatory model for circumstances in which registrants practise activities associated with specialties other than the specialty in which they are registered.

The proposed approach combines continued specialty-based registration with authorization for defined cross-specialty activities, supported by **proportionate regulatory controls intended to address the risks associated with those activities**.

The development is particularly useful for ORMI because it demonstrates risk-based regulation being applied to a complex regulatory-design problem: how to enable changing or overlapping professional practice while maintaining appropriate public-protection safeguards.

Rather than treating every cross-specialty activity identically, the model provides an example of **matching regulatory controls to the characteristics and risks of the activity being regulated**.

The proposal was presented to Council during Q3; ORMI does not assume from its inclusion in the meeting materials that the proposed model was subsequently approved or implemented.

(<https://cmrto.sharepoint.com/sites/PublicAgendas/Documents/Agendas/September-10-2026-Council-Agenda.pdf?ga=1>, pp. 14-59)

Also Observed in Q3

College of Dental Technologists of Ontario (CDTO) — proposed quality-assurance selection model using risk criteria and digital integration. (<https://cdto.ca/wp-content/uploads/150th-Board-Meeting-Public-Package-.pdf>, pp. 102-114)

College of Massage Therapists of Ontario (CMTO) — proposed reform of its quality-assurance framework incorporating a risk-based approach. (<https://www.cmto.com/wp-content/uploads/2026/09/Consolidated-Board-Meeting-Package-Sept-29-2026.pdf>, pp.179-198)

Ontario College of Teachers (OCT) — proposed policy-review cycle using risk criteria to set different review frequencies. (<https://cdn-ca.aglty.io/f2c1d1f3/council-agenda/2026-09-29/45-gep-risk-based-policy-review-cycle-bn.pdf>)

College of Dietitians of Ontario (CDO) — proposed practice-assessment policy with proportionate, stratified, risk-based selection. <https://collegeofdietitians.org/wp-content/uploads/2026/02/00-Agenda-2026-09-18WebsiteCombined-1.pdf>, pp.109-123)

ORMI Takeaway

Q3 provides evidence of risk-based regulation being applied across multiple regulatory functions—from quality assurance and standards to governance and regulatory-model design. While the approaches differ, they share an emphasis on calibrating regulatory attention or controls to identified risks rather than applying the same response in every circumstance.

Finding 3 — Practice Frameworks Are Adapting to Changing Practice and Expanded Scopes

Q3 materials show regulators addressing changes in **how professionals practise, what activities they may perform, and the regulatory expectations that support safe and competent practice.**

The developments span professional obligations, scopes of practice, standards, competencies, credentialing and implementation requirements. While the drivers differ across professions, the common regulatory challenge is how to maintain appropriate public-protection expectations as professional practice evolves.

ORMI Insight

Changes to professional practice rarely create a single regulatory question. Expanding a scope of practice, introducing a new authorized activity, accommodating new models of care, or reconsidering professional obligations can create interconnected requirements involving standards, competencies, education, credentialing, quality assurance and practice guidance. The Q3 evidence therefore highlights the importance of viewing practice modernization as a regulatory system, rather than as a series of isolated policy changes.

It also shows different approaches to determining the appropriate level of regulatory prescription. Some developments involve detailed requirements associated with new or expanded activities, while others seek to establish broader principles supported by more specific guidance where circumstances or risks warrant it.

Featured Development — CPSO Professional Obligations Framework

The **College of Physicians and Surgeons of Ontario (CPSO)** brought forward a redesigned framework for its professional obligations and supporting practice guidance.

The work reflects a **more streamlined and principle-based approach** to articulating core professional obligations, with supporting materials providing practical direction and greater specificity where appropriate. The underlying materials also distinguish between expectations that warrant inclusion as broad professional obligations and more detailed or prescriptive content better addressed through supporting guidance.

The approach is noteworthy because it addresses a recurring regulatory-design question: **how much prescription is necessary to protect the public while preserving appropriate professional judgment?**

Rather than treating principle-based and prescriptive regulation as competing choices, the framework illustrates how they can operate together—establishing clear overarching obligations while using more detailed guidance where the nature or level of risk justifies it.

https://www.cpso.on.ca/getmedia/1f2d7e48-b877-457c-8f97-8b2b84c06139/Board-Package_20260924.pdf, pp.50-179)

Also Observed in Q3

College of Chiropractors of Ontario (CCO) — implementation planning for diagnostic-ultrasound ordering authority and a related draft practice standard. (<https://cco.on.ca/wp-content/uploads/2026/09/Council-Public-Package-September-18-2026.pdf>, pp. 95-112)

College of Denturists of Ontario (CODO) — proposed fair-registration policies covering substantial equivalency, credential evaluation and language proficiency. (<https://denturists-cdo.com/About-Us/Council-Committees/Council/Council-Minutes-Highlights/Council-Packages/124th-Board-Meeting-Package.aspx>, pp. 94-143)

College of Dietitians of Ontario (CDO) — proposed modernization of its Self-Directed Learning Tool Policy for quality assurance. <https://collegeofdietitians.org/wp-content/uploads/2026/02/00-Agenda-2026-09-18WebsiteCombined-1.pdf>, pp. 95-108)

ORMI Takeaway

Q3 demonstrates that changing professional practice can require more than an amendment to a scope or standard. Regulators are considering the interconnected standards, competencies,

credentialing, guidance and implementation mechanisms needed to support changing practice while maintaining appropriate public-protection safeguards.

Finding 4 — Digital Capability and AI Are Developing Along Two Regulatory Tracks

Digital transformation and artificial intelligence were prominent in Q3 materials, but the activity does not represent a single modernization theme. The evidence points to **two related but distinct regulatory tracks**.

The Q3 evidence points to two related but distinct tracks: Internal AI/Digital, concerning regulators' own organizational capability and governance; and External AI/Digital, concerning the implications of AI and digital technologies for regulated professional practice.

Distinguishing between these two tracks is important because they create different governance, capability and public-protection requirements.

ORMI Insight

For regulatory organizations, digital modernization increasingly involves more than acquiring or upgrading technology. Q3 materials include data and business-intelligence infrastructure, cybersecurity, registration-system integration, and governance and controls for organizational use of AI.

At the same time, regulators are confronting a different question: what does responsible use of AI and other emerging technologies mean for regulated professionals? This can involve professional judgment, accountability, competence, privacy, transparency and the continuing applicability of existing professional obligations when technology is used in practice.

The two tracks can intersect, but they should not be conflated. A regulator may need the organizational capability to govern its own use of AI while separately determining how it will regulate the use of AI by members of the profession.

Featured Development — CNO Privacy Standard and AI in Nursing Practice

The College of Nurses of Ontario (CNO) presented proposed revisions to its privacy standard for Council decision. The draft addresses nurses' responsibilities when evaluating and using artificial intelligence technologies in care, bringing emerging digital practice into a professional standard.

The decision item is the proposed privacy standard. CNO also reported on enterprise data and business-intelligence capability in its Q3 materials; that organizational update provides context for the separate internal digital track and is not itself the selected decision exemplar.

Together, the materials illustrate two related dimensions of digital change: regulators developing their own information capability and setting expectations for technology used in professional practice.

The draft standard remained a proposal in the materials reviewed. ORMI does not infer that Council approved or implemented it. (<https://www.cno.org/Assets/CNO/Documents/What-is-CNO/council-briefing-package-september-2026.pdf>, pp.82-86)

Also Observed in Q3

College of Naturopaths of Ontario (CONO) — proposed policy for responsible and secure AI use by Council and committee members. (<https://www.collegeofnaturopaths.on.ca/wp-content/uploads/2026/09/Council-Meeting-Materials-Sept-30-2026-Redacted.pdf>, pp.115-116)

Ontario Association of Architects (OAA) — revised organizational AI Usage Policy and disclosure statement put to Council for approval. (https://oaa.on.ca/Assets/Common/Shared_Documents/Council/Packages/2026/20260917%20Open%20Meeting%20Information%20Package.pdf, pp.33-37)

ORMI Takeaway

Q3 suggests that digital modernization can be viewed along two tracks: Internal AI/Digital capability within regulatory organizations and External AI/Digital issues arising in regulated professional practice. The distinction matters because organizational technology governance and the regulation of technology-enabled professional practice create different risks, responsibilities and capability requirements.

Finding 5 — Performance and Risk Systems Are Evolving Toward Regulatory Intelligence and Adaptive Decision-Making

Q3 materials show several regulators strengthening the information available to Boards and Councils through **performance measures, risk indicators, dashboards, environmental scanning and more integrated reporting systems**.

The common thread is not simply more reporting. The more significant developments connect information about **performance, risk and the external environment** to governance and regulatory decision-making—helping governing bodies identify emerging issues, assess progress and determine where attention may be required.

ORMI Insight

Performance reporting has traditionally helped Boards and Councils understand what an organization has done and whether planned activities have been completed. The Q3 evidence

includes examples that extend this role by bringing together performance, risk, outcomes and environmental information to support forward-looking decisions.

This distinction is important. Reporting becomes more useful as regulatory intelligence when information helps decision-makers not only understand what has happened, but also recognize what may require attention, what is changing, and whether the regulatory response is producing the intended results.

The Q3 examples are at different stages of development and should not be interpreted as evidence of a common sector-wide model. They do, however, illustrate several ways regulators are strengthening the connection between evidence, risk and governance decision-making.

Featured Development — CDTO Enterprise Risk Management Framework

The College of Dental Technologists of Ontario (CDTO) Board was asked to review and approve an enterprise Risk Management Framework. The framework would give the Board and organization a more structured basis for identifying, assessing, monitoring and responding to risks.

The decision item links risk information to governance oversight. It is a more direct example of a system intended to inform future choices than a routine report of activities or indicators.

For ORMI, its significance lies in the proposed use of a common risk framework to support continuing oversight and decisions. The materials establish that approval was sought, not the outcome of the Board's consideration.

The example sits alongside other Q3 decisions about longer-range modelling, governance priorities and publication of effectiveness information. (<https://cdto.ca/wp-content/uploads/150th-Board-Meeting-Public-Package-.pdf>, pp. 39-54)

Also Observed in Q3

College of Medical Laboratory Technologists of Ontario (CMLTO) — multi-year financial model considering registrant numbers, costs, fees and reserves. (https://www.cmlto.com/wp-content/uploads/2026/09/2026_Sep_14-15_CMLTO-Public-Board-Meeting-Material.pdf, pp.88-100)

College of Medical Laboratory Technologists of Ontario (CMLTO) — phased 2026–2030 governance modernization plan informed in part by public-interest risk and priority assessments. (https://www.cmlto.com/wp-content/uploads/2026/09/2026_Sep_14-15_CMLTO-Public-Board-Meeting-Material.pdf, pp. 123-143)

College of Kinesiologists of Ontario (COKO) — Council consideration of whether to publish an effectiveness-review report, a narrower example of performance transparency. (<https://coko.ca/wp-content/uploads/2026/09/00.-Full-Package-COKO-Council-September-2026-2.pdf>, pp.34-37)

ORMI Takeaway

Q3 shows several regulators strengthening the connection between performance information, risk and decision-making. Dashboards, thresholds, outcome measures, environmental scanning and forward-looking analysis can help Boards and Councils move beyond retrospective reporting toward earlier recognition of issues and more adaptive regulatory oversight.

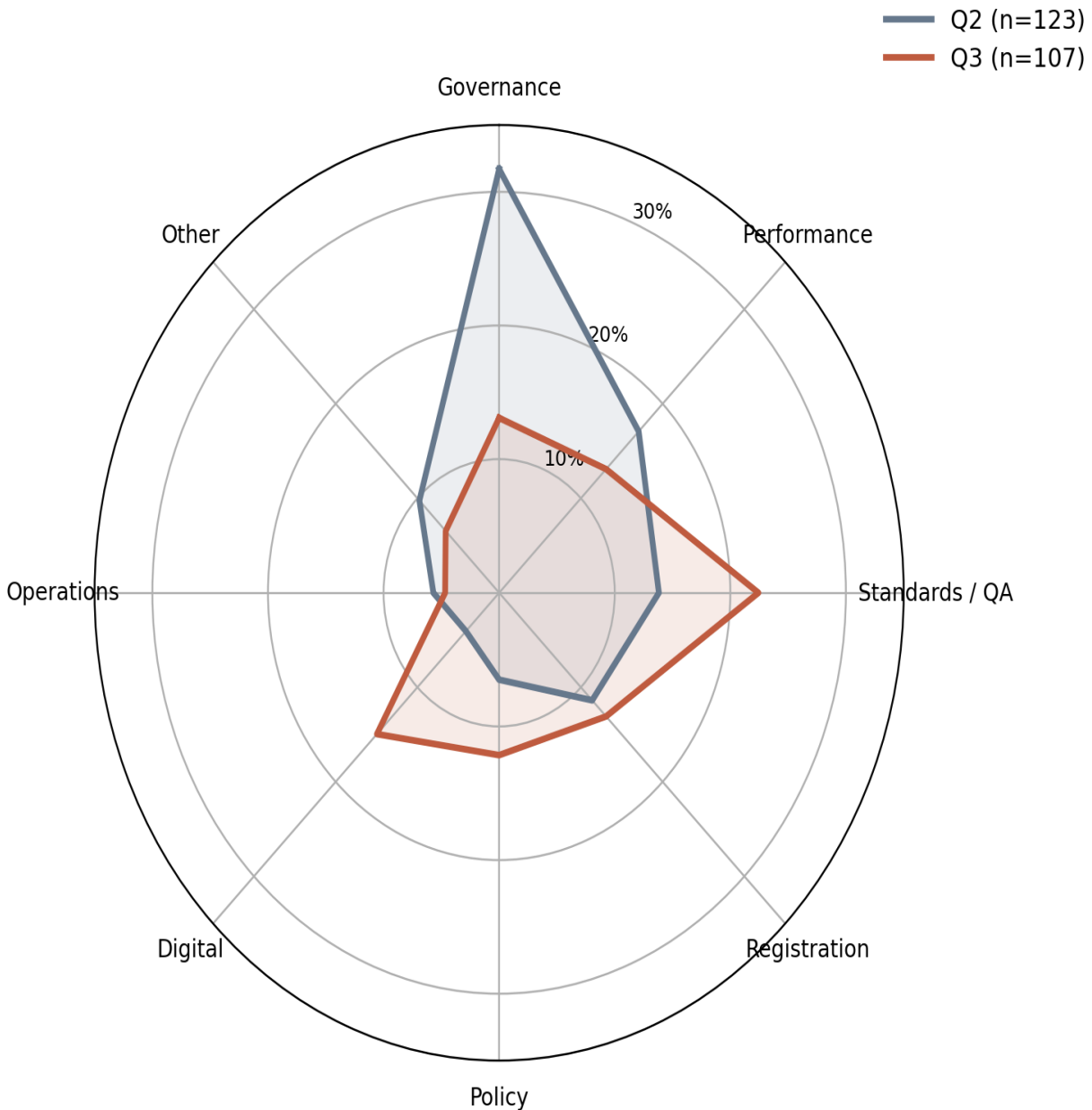
Q2–Q3 Board Attention Profile

The Q3 Board Attention Profile shows a different distribution of significant regulatory activity from Q2. Across the eight common reporting categories, Standards, Competence & QA represented the largest share of Q3 significant items at 22.4%, followed by Digital & Technology (15.0%). Registration & Entry-to-Practice, Governance & Oversight, and Performance & Accountability each accounted for 13.1%.

Governance & Oversight represented 31.7% of Q2 activity and 13.1% of Q3 activity. Digital & Technology, Standards, Competence & QA, Policy & Legislative Reform, and Registration & Entry-to-Practice occupied greater shares of the Q3 materials reviewed.

Largest Q2–Q3 Differences in Relative Concentration

Greater relative concentration in Q3	Diff.	Lower relative concentration in Q3	Diff.
Digital & Technology	+10.9 pts	Governance & Oversight	–18.6 pts
Standards, Competence & QA	+8.6 pts	Performance & Accountability	–4.0 pts
Policy & Legislative Reform	+5.6 pts	Other Regulatory Activity	–3.2 pts
Registration & Entry-to-Practice	+1.7 pts	Operations, Resources & Strategy	–1.0 pts



ORMI Observation

The Q3 profile differs materially from Q2, particularly in the relative concentration of governance, digital and technology, standards and competence, regulatory policy, and registration activity. These differences describe what appeared in publicly available Board/Council materials during each quarter; they do not establish changes in organizational priorities or explain why those differences occurred.

Quarterly Board/Council agendas can reflect many influences, including strategic choices, normal work cycles, implementation schedules, legislative or government requirements, emerging issues, and other internal or external demands. Additional quarters of ORMI evidence will help determine

whether the differences observed in Q3 persist, change again, or prove to be specific to the period reviewed.

Figure note: To support a consistent Q2–Q3 comparison, the Q2 Board Attention categories have been consolidated into the eight reporting categories shown in this analysis. The underlying Q2 items and RIL classifications have not been changed; only the reporting categories have been regrouped for comparative presentation. Percentages are based on significant RIL 2–5 items in each quarter (Q2: n=123; Q3: n=107). Differences show the relative concentration of publicly visible Board/Council activity and should not be interpreted as evidence of changes in organizational priorities or the reasons for those differences.

What We’re Watching

ORMI will continue to monitor whether several patterns visible in Q3 persist, evolve or appear differently as new matters reach Boards and Councils. These are **areas for continued observation rather than predictions about future regulatory priorities**.

Internal and External AI/Digital

Q3 showed two distinct dimensions of AI and digital activity: **Internal AI/Digital**, involving technology used within or on behalf of the regulatory system; and **External AI/Digital**, involving the implications of technology for regulated professional practice.

Future ORMI reviews will monitor whether this distinction continues to appear, including the governance of AI used by third-party regulatory service providers such as examination and assessment providers.

Risk-Based Regulation Across Regulatory Functions

Risk-based approaches appeared across a wide range of Q3 activity, including quality assurance, standards, governance, practice assessment and regulatory-model design.

ORMI will monitor whether this breadth continues and whether additional regulatory functions begin to incorporate more explicit **risk differentiation, proportionality or targeting of regulatory attention**.

From Scope and Practice Change to Implementation

Several Q3 developments involved expanded scopes, changing professional practice or redesigned practice frameworks. The next stages may bring different regulatory issues into public governance materials.

ORMI will watch for associated work involving **competencies, credentialing, standards, education, quality assurance, monitoring and evaluation**, particularly where several of these mechanisms are being developed together.

Connecting Performance, Risk and Regulatory Intelligence

Q3 included examples of dashboards, risk thresholds, outcome measures, environmental scanning and integrated reporting intended to strengthen information available for governance and regulatory decisions.

Future quarters will help show whether these remain individual initiatives or whether a broader pattern develops in which **performance, risk and environmental information are increasingly brought together to support regulatory intelligence and adaptive decision-making.**

Questions for Regulatory Leaders

The Q3 findings raise several questions for regulatory leaders as they consider their own modernization priorities and capabilities:

1. **Where is modernization occurring in our regulatory model—not just in our organizational processes?**
2. **Where could a more risk-based or proportionate approach improve how we target regulatory attention and resources?**
3. **As professional practice changes, are our standards, competencies, credentialing, quality assurance and guidance evolving together—or independently?**
4. **Are we prepared for both dimensions of AI and digital change: how we use and govern technology within our regulatory system, and how technology is changing the practice we regulate?**
5. **Does the information reaching our Board/Council help it recognize emerging risks and changing conditions, or primarily report what has already happened?**
6. **How will we know whether our regulatory changes are producing the intended public-interest outcomes?**

Implications and Conclusion

The Q3 ORMI evidence provides a picture of modernization activity extending into core regulatory functions. Across the quarter, Boards and Councils considered changes involving regulatory models, risk-based approaches, professional standards and scopes, digital and AI capability, and the information systems used to support regulatory decisions.

Several broader implications emerge from these findings.

First, the Q3 findings illustrate how regulatory modernization can be interconnected. Changes to scope or professional practice can have implications for standards, competencies, credentialing and quality assurance. Risk-based approaches can influence how regulatory requirements and resources are applied. AI and digital technologies create both organizational governance requirements and new professional-practice questions. Modernization in one part of the regulatory system can therefore create capability requirements elsewhere.

Second, the Q3 evidence highlights the importance of regulatory capability alongside regulatory change. New frameworks, technologies or authorities may require regulators to develop the

supporting information, competencies, governance processes and implementation mechanisms needed to make them effective.

Third, Q3 illustrates the role of information as a regulatory asset. Several developments connect performance, risk, environmental scanning and other evidence more directly with governance and decision-making. The value of these systems lies not simply in producing more information, but in helping regulatory leaders recognize significant developments, determine where attention is required and assess whether regulatory responses are achieving their intended results.

Conclusion

Q3 does not establish a single direction of travel for Ontario professional regulation. The matters reaching Boards and Councils reflect different mandates, stages of development, strategic choices and internal and external demands.

What the quarter does show is the breadth of modernization activity visible at the governance level. Regulatory models, risk-based approaches, changing practice, AI and digital technology, and performance intelligence are all appearing within the work being brought before Ontario regulatory Boards and Councils.

Future ORMI reviews will help determine which of these patterns persist, which change as different issues reach governing bodies, and which may develop into longer-term features of Ontario's regulatory landscape.

For more information, contact:

Jordan Max

President, Upstream Management Solutions

www.upstreammanagesolutions.com

jordan@upstreammanagesolutions.com

416-880-0353

Appendix A — ORMI Methodology and Interpretation

Purpose

The Ontario Regulatory Modernization Index (ORMI) provides an evidence-based view of significant regulatory issues, initiatives and priorities receiving attention from Ontario professional regulatory Boards and Councils.

ORMI is designed to identify patterns in publicly visible regulatory activity, support comparison over time, and provide early intelligence about developments that may be relevant across the regulatory sector.

Sources and Coverage

ORMI analyzes **publicly available Council/Board agendas, meeting materials and minutes published on Ontario professional regulators' websites.**

For Q3 2026, ORMI analyzed 107 significant items from 25 Board/Council meetings involving 23 Ontario health and non-health regulators. All qualifying Q3 meetings reviewed occurred in September.

Items are assigned to a quarter according to the **date of the Board/Council meeting at which the matter was considered**, rather than the date on which the meeting materials were published.

Standalone Annual Reports, Strategic Plans and other organizational publications are not independently scored in ORMI unless the relevant matter is presented through a Council/Board meeting. This maintains ORMI's focus on matters that have reached publicly visible governance attention and avoids duplicating initiatives reported retrospectively in other organizational publications.

What ORMI Captures

ORMI identifies significant matters presented to Boards and Councils for information, discussion, oversight or decision. The Brief's Featured Developments and Also Observed examples use the narrower pool of items presented for discussion, decision or approval; information updates may provide context but are not selected as stand-alone exemplars.

Inclusion in ORMI, or selection as an exemplar, means that a matter reached publicly visible governance attention. It does not mean the matter was approved, implemented or proceeded as presented. Where the materials seek a decision or approval, the Brief describes the proposal without assuming an outcome.

Similarly, ORMI does not capture the full pipeline of work that may be under **research, development or internal consideration** but has not yet reached a public Board/Council agenda.

The absence of an activity from ORMI therefore should **not be interpreted as evidence that the activity is not occurring.**

Regulatory Intensity Level (RIL)

ORMI uses the **Regulatory Intensity Level (RIL)** to distinguish the relative significance of matters appearing in governance materials.

The Q2–Q3 Board Attention Profile uses **RIL 2–5 items**, providing a common basis for comparing the relative concentration of significant regulatory activity between quarters.

ORMI does not measure the amount of Board/Council meeting time devoted to an issue, the quality of the resulting decision, organizational effectiveness, or the motivations underlying the matters presented.

Interpreting Quarterly Comparisons

Quarter-to-quarter differences describe changes in the **relative concentration of publicly visible Board/Council activity**.

They should not automatically be interpreted as changes in organizational priorities or deliberate shifts in regulatory direction. Quarterly agendas may reflect strategic choices, normal work cycles, implementation schedules, legislative or government requirements, emerging issues, or other internal and external demands.

Additional quarters of evidence are required to determine whether observed differences represent sustained patterns or quarter-specific activity.

This is consistent with the Q2 methodology, which already cautioned that ORMI cannot measure motivations or intentions and that not all organizational activity reaches publicly visible Board/Council materials.

Appendix B — Q3 Board Attention Profile and Q2–Q3 Category Crosswalk

Q3 2026 Board Attention Profile

Reporting Category	Q3 Items	Share
Standards, Competence & QA	24	22.4%
Digital & Technology	16	15.0%
Registration & Entry-to-Practice	14	13.1%
Policy & Legislative Reform	13	12.1%
Governance & Oversight	14	13.1%
Performance & Accountability	14	13.1%
Other Regulatory Activity	7	6.5%
Operations, Resources & Strategy	5	4.7%
Total	107	100.0%

Q2–Q3 Comparative Profile

Common Reporting Category	Q2	Q2 %	Q3	Q3 %	Diff.
Governance & Oversight	39	31.7%	14	13.1%	–18.6 pts
Performance & Accountability	21	17.1%	14	13.1%	–4.0 pts
Standards, Competence & QA	17	13.8%	24	22.4%	+8.6 pts
Registration & Entry-to-Practice	14	11.4%	14	13.1%	+1.7 pts
Policy & Legislative Reform	8	6.5%	13	12.1%	+5.6 pts
Digital & Technology	5	4.1%	16	15.0%	+10.9 pts
Operations, Resources & Strategy	7	5.7%	5	4.7%	–1.0 pts
Other Regulatory Activity	12	9.8%	7	6.5%	–3.2 pts
Total	123	100.0%	107	100.0%	

The Q2 Brief's original detailed Board Attention analysis contained **123 RIL 2–5 items across 14 categories**. For the Q3 comparison, those categories have been consolidated into eight common reporting categories. **No underlying Q2 item or RIL classification has been changed.**

Q2 Category Consolidation Crosswalk

Q3 Comparative Category	Original Q2 Categories Included
Governance & Oversight	Governance & Oversight; Executive Leadership & Succession
Performance & Accountability	Performance & Accountability
Standards, Competence & QA	Standards, Competence & QA
Registration & Entry-to-Practice	Registration & Entry-to-Practice
Policy & Legislative Reform	Regulatory Policy & Legislative Reform
Digital & Technology	Digital Transformation & Technology
Operations, Resources & Strategy	Financial Sustainability & Resource Allocation; Strategy
Other Regulatory Activity	Risk Management; EDI; Complaints, Discipline & Fitness to Practise; Stakeholder Relations & Communications; Innovation

Appendix C — Q3 2026 Coverage

ORMI Q3 2026 analyzed significant items identified in publicly available Board/Council materials from the following Ontario professional regulators.

Meeting Date	Regulator	Board/Council Meeting Reviewed
Sept. 10	College of Medical Radiation and Imaging Technologists of Ontario (CMRITO)	Special Council Meeting
Sept. 11	College of Dental Hygienists of Ontario (CDHO)	Council/Board Meeting Package
Sept. 14	College of Medical Laboratory Technologists of Ontario (CMLTO)	Board Meeting Package
Sept. 15	College of Kinesiologists of Ontario (COKO)	Council/Board Meeting Package
Sept. 16	College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO)	Council Meeting
Sept. 17	Ontario Association of Architects (OAA)	Council/Board Meeting Package
Sept. 18	College of Chiropractors of Ontario (CCO)	Council/Board Meeting Package
Sept. 18	College of Denturists of Ontario (CODO)	Board Package
Sept. 18	College of Dietitians of Ontario (CDO)	Council Package
Sept. 18	College of Optometrists of Ontario	Council Package
Sept. 23	College of Veterinarians of Ontario (CVO)	Legacy Council Meeting Package
Sept. 23	College of Veterinarians of Ontario (CVO)	Transition Council Meeting Package
Sept. 24	College of Nurses of Ontario (CNO)	Council Briefing Package
Sept. 24	College of Physicians and Surgeons of Ontario (CPSO)	Board Meeting Package
Sept. 24	Royal College of Dental Surgeons of Ontario (RCDSO)	Council/Board Meeting Package
Sept. 25	College of Audiologists and Speech-Language Pathologists of Ontario (CASLPO)	Council/Board Meeting Package
Sept. 25	College of Dental Technologists of Ontario (CDTO)	Board Meeting Package
Sept. 25	College of Medical Radiation and Imaging Technologists of Ontario (CMRITO)	Council/Board Meeting Package
Sept. 25	College of Psychologists and Behaviour Analysts of Ontario (CPBAO)	Board Meeting Package
Sept. 28	Ontario College of Pharmacists (OCP)	Board Meeting Package
Sept. 28	College of Physiotherapists of Ontario (CPO)	Board Meeting Package
Sept. 28	College of Opticians of Ontario	Board Meeting Package
Sept. 29	College of Massage Therapists of Ontario (CMTO)	Board Meeting Package
Sept. 29	Ontario College of Teachers (OCT)	Council Meeting Materials
Sept. 30	College of Naturopaths of Ontario (CONO)	Council Meeting Materials