



**UPSTREAM
MANAGEMENT
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Ontario Regulatory Modernization Index (ORMI) *Sector Intelligence Monitor — Regulatory modernization*

Executive Summary

To identify emerging trends in Ontario regulatory bodies' Council and Board decisions, Upstream Management Solutions has developed the Ontario Regulatory Modernization Index (ORMI). The ORMI provides a structured analysis of the latest publicly available Board and Council meeting materials from **33 Ontario professional regulators**, using a strict **explicit agenda-item coding approach**.

Key findings from the Q1 2026 snapshot

Routine Governance share of board agendas: 82.8%

Modernization share of Board agendas (BAAM): 17.2%

ORMI Score: 77.4 / 100

Modernization signals identified: 258

The analysis identifies modernization signals within governance activity by assigning each agenda item a Regulatory Intensity Level (RIL) indicating the significance of the governance action. Across the sector, while routine governance items predominate (83%) agendas across the sector, modernization initiatives now appear in roughly one in six Board agenda items. These findings suggest that modernization is increasingly embedded within routine governance oversight rather than occurring only during major regulatory reform cycles.

Health colleges show slightly higher modernization activity, reflecting the broader statutory program responsibilities of health regulators — including Quality Assurance, Fitness to Practise, and Patient Relations — as well as additional oversight requirements such as College Performance Measurement Framework reporting.

ORMI will be **updated quarterly as additional regulatory Board and Council materials become available**. For regulatory leaders interested in deeper analysis or benchmarking their organization's activity, the **ORMI Executive Brief** provides additional insights into modernization signals across the sector, available upon request.

Ontario Regulatory Modernization Index (ORMI) Q1 Snapshot

The ORMI provides a structured analysis of the latest publicly available Board and Council meeting materials from **Ontario professional regulators**, using a strict **explicit agenda-item coding approach** and a taxonomy of 6 governance domains and twelve agenda categories.

The analysis identifies **modernization signals** within governance activity (domains and categories) by assigning each agenda item a **Regulatory Intensity Level (RIL)** reflecting its significance.

For Q1 2026, the ORMI analysis reviewed the most recent publicly available Board and Council agenda materials from **33 Ontario regulators**, covering both health colleges and non-health professional regulatory bodies. The analysis identified **258 high-impact modernization signals (RIL 3–5)** across these organizations.

Note: Other health colleges and non-health regulators did not post their Board/Council meeting agendas or minutes and were therefore excluded from this analysis.

Q1 2026 ORMI Scorecard

Metric	Result
Regulators analyzed	33
Agenda Items analyzed	971
Routine Governance share of Board agendas	82.8%
Modernization share of Board agendas (BAAM)	17.2%
Health colleges modernization share (BAAM)	18.7%
Non-health bodies modernization share (BAAM)	11.8%
Modernization signals identified	258
ORMI modernization score	77.4 / 100
Data coverage	March 4, 2026

Routine governance oversight continues to account for the majority of Board agenda activity (82.8%), while modernization initiatives represent approximately one in six (17%) agenda items across the sector.

The ORMI score reflects the **average intensity of modernization signals** observed across regulatory governance agendas.

ORMI is calculated as:

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ORMI = (Average RIL ÷ 5) × 100

Importantly, ORMI **does not rank regulators or evaluate performance**. Instead, it identifies **sector-wide modernization patterns**.

A second level of analysis (Board Agenda Modernization Mix or BAAM) measures what percentage of a Board or Council’s meeting agenda items are modernization signals (RIL 3-5). The BAAM is presented in aggregate for all 33 regulators and is further broken down for Health and non-Health regulators. For more information, see the BAAM section below.

What ORMI Measures

ORMI classifies Board and Council agenda items into six governance domains and twelve agenda categories.

Domain	Domain Type	Category Type	Category Name
Governance & Oversight Architecture	A	A1	Board Governance & Oversight
Governance & Oversight Architecture	A	A2	Member Representation, Chapters & Electoral Governance
Performance, Risk & Accountability	B	B1	Organizational Performance & Government Reporting
Organizational Enablers & Capacity	C	C1	Digital Transformation & Technology
Organizational Enablers & Capacity	C	C2	Financial Sustainability & Resource Allocation
Organizational Enablers & Capacity	C	C3	Executive Leadership & Succession
Regulatory Policy & Reform	D	D1	Regulatory Policy & Legislative Reform
Regulatory Policy & Reform	D	D2	Ministry & Legislative Relations
Core Regulatory Lifecycle	E	E1	Licensure & Entry-to-Practice
Core Regulatory Lifecycle	E	E2	Professional Practice Standards & Continuing Competence
Core Regulatory Lifecycle	E	E3	Complaints, Discipline & Enforcement
System & Interjurisdictional Interface	F	F1	National Body & Federation Issues

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ORMI then identifies modernization signals by analyzing **agenda items in publicly available Board and Council materials**.

Each agenda item is coded according to a **Regulatory Intensity Level (RIL)**.

RIL Description

- RIL 1 Routine governance oversight
- RIL 2 Monitoring or operational updates
- RIL 3 High-impact governance or policy update
- RIL 4 Significant modernization initiative
- RIL 5 Structural regulatory change

The ORMI score focuses on **higher-impact modernization signals (RIL 3–5)**.

These signals typically represent initiatives such as:

- governance modernization initiatives
- regulatory lifecycle reforms
- professional standards updates
- digital regulatory infrastructure
- performance and accountability frameworks
- legislative and regulatory reform initiatives

For a detailed list of the RILs, see **Appendix A**.

Board Agenda Attention Mix (BAAM)

In addition to modernization intensity, ORMI measures Board Agenda Attention Mix (BAAM). BAAM measures the share of Board agenda items devoted to modernization activity (RIL 3–5), providing an indicator of how governance attention is distributed between modernization initiatives and routine regulatory oversight.

Q1 2026 BAAM Results

Sector	BAAM
Full sector	17.2%
Health colleges	18.7%
Non-health bodies	11.8%

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This means that modernization initiatives now appear in roughly **one in six Board agenda items** across the sector.

The results suggest that modernization is becoming a **regular element of regulatory governance oversight rather than a rare event**.

Health colleges show slightly higher modernization activity, reflecting the greater policy complexity of the health regulatory environment. Health regulators oversee additional statutory programs – including **Quality Assurance, Fitness to Practice, and Patient Relations** – and operate with an additional layer of external oversight through **College Performance Measurement Framework (CPMF)** reporting.

Routine governance oversight (RIL 1–2) continues to account for the majority of Board agenda activity, representing approximately **82.8%** of agenda items.

Modernization Patterns: Category x Regulatory Intensity Analysis

Further cross-tab analysis of modernization signals by **Agenda category** and **Regulatory Intensity Level (RIL)** provides additional insight into how modernization is occurring across Ontario’s regulatory sector.

Nearly all structural regulatory change signals (**RIL5**) occur within **regulatory policy and legislative reform initiatives**, reinforcing the central role of policy development as the primary mechanism of regulatory modernization.

In contrast, most **RIL4 modernization initiatives** occur within operational and infrastructure categories such as:

- Organizational Performance & Government Reporting
- Digital Transformation & Technology
- Professional Practice Standards & Continuing Competency
- Core Regulatory Lifecycle modernization initiatives

This pattern suggests that regulatory modernization in Ontario is currently occurring primarily through **program and policy initiatives rather than large-scale structural governance reform**.

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Structural reform appears selectively through legislative and policy change, while most modernization activity focuses on improving **regulatory infrastructure, oversight systems, and professional standards frameworks**.

ORMI Insight

Nearly **90% of structural regulatory change signals (RIL5)** identified across Ontario regulators occur within **regulatory policy and legislative reform initiatives**, reinforcing the central role of policy development as the primary mechanism of regulatory modernization.

Concentration of Modernization Drivers

Modernization signals are **highly concentrated within a relatively small number of regulatory functions**.

- Organizational Performance & Government Reporting systems (25.6%)
- Board Governance & Oversight modernization (14.0%)
- Digital regulatory infrastructure modernization (13.2%)
- Regulatory Policy & Legislative Reform initiatives (13.2%)
- Professional Practice Standards modernization (11.6%)

Together, these five categories account for **approximately 78% of all modernization signals** identified across the sector.

This concentration suggests that regulators are focusing modernization efforts on strengthening **governance oversight, regulatory infrastructure, and policy frameworks**. For more details, see Appendix B.

Interpretation: Modernization Through Policy and Infrastructure

Taken together, the ORMI and BAAM findings and cross-tab analysis indicate that modernization across Ontario regulators is **deliberate but targeted**.

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Structural regulatory reform appears primarily through **policy and legislative initiatives**, while most modernization activity focuses on strengthening regulatory infrastructure, oversight systems, and professional standards frameworks.

This suggests that modernization across the sector is occurring primarily through **policy development, operational improvements, and governance modernization rather than wholesale institutional redesign**.

In practical terms, modernization appears to be occurring through:

- policy and legislative reform initiatives
- digital regulatory infrastructure modernization
- performance and accountability systems
- professional practice standards updates
- governance oversight improvements

This pattern reinforces the importance of **strong policy capacity** within regulatory organizations.

Policy development serves as the primary mechanism through which modernization initiatives are designed, implemented, and sustained.

Implications for Regulatory Leaders

The ORMI findings suggest several implications for regulatory leadership and governance oversight.

First, modernization initiatives are becoming a **routine component of regulatory governance agendas**, requiring Boards and Councils to engage regularly with policy, infrastructure, and system modernization issues.

Second, the concentration of modernization activity within specific categories highlights the importance of **strategic policy capacity** within regulatory organizations.

Strong policy capacity enables regulators to:

- design modernization initiatives
- integrate policy changes across regulatory functions
- ensure modernization initiatives remain aligned with public-interest mandates

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Finally, the increasing presence of modernization initiatives within governance agendas suggests that regulatory Boards will continue to play a central role in **guiding modernization strategy**.

About Upstream Management Solutions

Upstream Management Solutions provides advisory services, training, and policy support to professional regulators and regulatory organizations.

Our work focuses on strengthening regulatory capacity in areas such as:

- regulatory policy and governance
- modernization strategy
- performance measurement and reporting
- stakeholder engagement
- regulatory service design

Appendix A: ORMI RIL Coding Framework

RIL 1 — Routine Governance Mechanics

- Approval of minutes
- Consent agenda
- Routine committee reports (received for information)
- Standard financial statements (no reform attached)
- Routine CEO / Registrar reports
- President / Chair reports or remarks
- Standing reports (no decision requested)
- Appointment confirmations (non-structural)
- In-camera notices
- Meeting evaluations
- Adjournment

Principle: No structural, policy, standards, or governance change implied.

RIL 2 — Operational / Informational Oversight

- Dashboard updates (no redesign)
- Risk register updates (no architectural change)
- Operational performance reports
- Program updates
- IT status updates
- Stakeholder engagement updates
- Legislative monitoring updates
- Environmental scans
- Compliance statistics reports

Principle: Oversight activity and discussion, but no modernization decision.

RIL 3 — Governance / Policy Update

Includes:

- Policy amendments
- Policy direction
- Standards amendments
- Guideline amendments
- Budget approval

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- Governance framework updates
- Procedural reforms
- Committee mandate revisions
- Structured risk framework approval (non-overhaul)
- Consultation approvals

Principle: Meaningful change within existing architecture.

RIL 4 — Significant Modernization Initiative

Includes:

- Strategic plan approval
- Specific Budget – identified major transformation initiative
- Enterprise risk architecture overhaul
- AI governance framework adoption
- Major competency model reform
- Large-scale technology modernization
- Major governance redesign
- New regulatory program
- Regulatory program overhaul
- New practice standard
- New practice guideline

Principle: New architecture, not just revision.

RIL 5 — Structural Regulatory Change

- Legislative amendments (Act, Regulation, or Bylaw)
- Regulatory restructuring
- Scope-of-practice overhaul
- Creation/elimination of major governance bodies
- Structural mandate changes

Principle: Alters regulatory structure or statutory authority.

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Appendix B – Modernization Signals by Category and Regulatory Intensity Level (RIL)

ORMI v2 Category	RIL 2	RIL 3	RIL 4	RIL 5	Total	% by category
Board Governance & Oversight	4	10	26	0	40	16%
Complaints, Discipline & Fitness to Practise	0	3	6	1	10	4%
Digital Transformation & Technology	0	0	34	0	34	13%
Executive Leadership & Succession	1	4	0	0	5	2%
Financial Sustainability & Resource Allocation	0	18	3	0	21	8%
Licensure & Entry-to-Practice	0	2	5	0	7	3%
Member Representation, Chapters & Electoral Governance	4	0	0	0	4	2%
Ministry & Legislative Relations	0	1	0	0	1	0%
National Body & Federation Issues	2	3	1	0	6	2%
Organizational Performance & Government Reporting	0	22	42	2	66	26%
Professional Practice Standards & Continuing Competence	0	2	28	0	30	12%
Regulatory Policy & Legislative Reform	0	0	4	30	34	13%
Total	11	65	149	33	258	100%
% by RIL	4%	25%	58%	13%	100%	

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Modernization Signal Concentration by Category (RIL 3-5)

